

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
)	MM Docket No. 99-25
Creation of a Low)	
Power Radio Service)	
)	

COMMENTS OF THE OHIO STATE UNIVERSITY

The Ohio State University, a state-supported institution of higher education, currently holds licenses for one AM and five FM public radio stations in the State of Ohio. The signals of Ohio State’s FM stations cover 41 of Ohio’s 88 counties and are available to more than 2.7 million people. Ohio State also has more than 55,000 students and more than 400 independent student organizations, representing an extraordinary range of interests and views, on its five campuses. Ohio State supports the LPFM proposal in principle, but wishes to stress the following points:

1. Under whatever form the proposal ultimately may take, there must be reasonable assurances that LPFM stations will not unduly interfere with the signals of existing, full-power stations. Ohio State currently does not have sufficient data on which to base a conclusion as to whether the specific measures proposed by the FCC would provide adequate protection and therefore defers specific comment on that issue at this time. Ohio State does, however, believe that the standard for determination on that issue should *not* be that there be *no* interference whatever with existing stations’

signals. Some *minimal* amount of interference that occurs *both* outside of existing stations' protected geographical contours *and* at the peripheries of their protected spectrum allocations *may* be an acceptable tradeoff for the benefits of increased diversity on the airwaves. Ohio State urges the FCC to conduct a searching inquiry into the technical feasibility and impact of its proposal and to develop a record upon which such a determination can appropriately be made.

2. Ohio State is particularly concerned that the ownership rules *not* be drafted in such a way that students and student organizations be deemed to have "an attributable interest in a full-power broadcast station" simply because the college or university they attend happens to have a full-power station of its own or because they receive support from student activity or similar fees. On many campuses, students and student organizations lack access to college- and university-owned stations and, even in those instances when the stations are partially or fully student-run, the stations realistically cannot represent the interests and views of the entire student body. To attribute an *automatic* disqualifying interest to all students and student organizations at licensed colleges and universities would thus be to disenfranchise a large and extraordinarily diverse class of the very "voices" that the proposal is, appropriately, intended to promote. (The existence of other, student-run stations in the same area might, however, be an appropriate consideration in determining which of competing LPFM applications to grant.) Similarly, students and student organizations should not be required, as a condition of obtaining a license, to forego the financial support that colleges

and universities traditionally have made available to their students and student organizations. Students and student organizations should be eligible to apply for LPFM licenses without regard to any licenses that may be held by their colleges and universities and without regard to the source of their funding, provided only that the programming of the stations they propose to operate not be actively managed and controlled by the relevant colleges and universities themselves.

3. Ohio State specifically supports adoption of the “microradio” option, subject to the comments set forth in paragraph one above and on the assumption that that option would significantly reduce the likelihood of undue interference with the signals of existing, full-power stations. Ohio State believes that the proposed geographical range of “microradio” stations would be well-suited to the audiences that students and student organizations would be most likely to target.

Respectfully submitted,

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