

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

In the Matter of	)	MM Docket No. 99-25
	)	
Creation of a Low	)	RM-9208
Power Radio Service	)	RM-9242

To: The Commission

COMMENTS OF THE NATIONAL FEDERATION OF  
COMMUNITY BROADCASTERS

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## **SUMMARY**

NFCB applauds the Commission for this initiative and generally supports the creation of a new LPFM service along the lines discussed herein.

To foster diversity and to avoid the creation of new interference, we believe sound engineering standards and strict ownership limits are appropriate. The new service should be noncommercial, only. Any single entity should be eligible for only one license.

We recommend that eligibility be limited to entities whose governing board has a majority of local residents. We oppose any other ornate local employment or content restrictions. We do believe however, that strict new underwriting criteria are essential.

NFCB urges that one, primary service be authorized, with power limits available for the applicant to select, LP1000, LP100, or LP10. But we urge that no LP1000's be permitted in the top markets, where spectrum is most scarce.

To the degree that the Notice rationalizes this service as a means of fostering diversity, particularly racial and ethnic diversity, we offer a note of caution. Public radio and community broadcasters in particular have been instrumental in creating opportunities for training, development and leadership of minorities in broadcasting. We cannot cease from these efforts and we implore the Commission to examine every other means to this end. This initiative is welcomed as but one piece of the puzzle, but necessarily, as a solution it can only be incremental.