

8/1/99

**Before the
Federal Communications Commission
Washington, DC 20554**

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

Comments of
American Library Association
Regarding February 3, 1999
Notice of Proposed Rule Making

Submitted,
August 2, 1999

No. of Copies rec'd 0+4
List # 100

In Re: FCC Notice of Proposed Rule Making (MM Docket No. 99-25)

The American Library Association (ALA) respectfully submits its comments on the above referenced proceeding regarding the creation of a low power radio service. The American Library Association, founded in 1876, is the oldest and largest library association in the world. With a membership of more than 57,000 librarians, library trustees, library educators, friends of libraries and other interested persons from every state, ALA is the chief advocate for the people of the United States in their search for the highest quality of library and information services.

The American Library Association commends the Commission for its proposal to authorize the operation of low power FM (LPFM) radio stations. We applaud the FCC's goals to deploy LPFM to "...address unmet needs for community-oriented radio broadcasting, to foster opportunities for new radio broadcast ownership, and promote additional diversity in radio voices and services."

ALA is a strong supporter of the principles related to increasing and improving access to information, community access to media, and diversity of voices and services in media, as well as community-oriented and locally-originated radio programming. ALA has a long tradition of ensuring access to information; and many libraries use various media, including broadcast media (such as cable television), to provide services to our communities.

We are concerned that the radio broadcasting market appears to be changing such that local control and locally originated radio programming is decreasing. In a growing number of markets, local control and programming have been replaced by syndicated national programming, shorter or more limited play lists, and canned formats such as the "urban contemporary" format. A community's diversity is no longer reflected by local radio programming, since in many markets, local origination does not exist. According to an article from the Washington Monthly, "The Death of Local Radio..." by Linda Polgreen,

"One third off all radio stations in the United States have changed hands since 1996. In 1996 alone 2045 radio stations were sold...[and of] 4992 stations...almost half are now owned by a company with three or more stations in the market...In 1996,...600 or so radio stations were owned by the top 10 radio stations...Today, the four biggest companies...control...almost twice that number. There are 1,000 fewer station owners today than there were in 1995".

And there are fewer independent commercial radio stations, especially in the major markets.

These trends, however, which tend to limit local access to a previously locally available medium, can be offset through the creation of LPFM. This is especially true if some of

the LPFM stations are noncommercial educational broadcasting stations. Libraries, including public, school, and those in small-to-medium sized colleges would consider LPFM to be an avenue to extend their traditional and central roles as providers of information, education, and cultural services to their communities. Consequently, should LPFM and microradio become available, libraries would be applicants. Additionally, the lower costs of LPFM and microradio would provide access into noncommercial broadcasting for libraries. For most libraries, entering into and engaging in noncommercial broadcasting is cost prohibitive. But with the availability of LPFM, libraries could use the stations to extend their services to their communities in innovative ways, including radio broadcast of:

- *ongoing and special library-sponsored community events that take place in and outside of the library's facility;

- *children's story hour programs;

- *information and reading programs for the home-bound (currently an under-served community);

- *elementary, secondary, and collegiate student services (e.g., school/academic and event calendars and student/teacher radio program production and related learning activities and experiences);

- *programs using a library's music collection;

- *cultural/language group programs to promote library use and to use/promote the library's foreign language materials; and

- *other library related activities and programs developed in collaboration with community organizations, local officials, and other local interests.

In conclusion, we applaud and support, in principle, the FCC proposal to create low power FM radio and microradio as vehicles for community access, diversity of voices, and access to information. Libraries have an interest in LPFM since it is merely an extension of our traditional role of providing access to information. It logically follows that libraries would also be applicants for the LPFM licenses and/or contributors to programming. These new roles would extend library services in innovative ways to currently served, as well as, under-served populations in their communities. Therefore, LPFM would not only provide a mechanism for greater diversity and access, it would also give libraries a new tool for serving our communities.

Thank you for the opportunity to comment on this proposal.

Respectfully Submitted,

A handwritten signature in black ink that reads "Carol C. Henderson". The signature is written in a cursive style and is underlined.

Carol Henderson
Executive Director
American Library Association Washington Office
1301 Pennsylvania Avenue, NW Suite 403
Washington, DC 20004

August 2, 1999