

COMMENT ON DOCKET 99-25 (LPFM)

LPFM represents an unprecedented opportunity to offer exposure to the vast wealth of creative musical expression that already exists but remains unheard due to the detrimental stranglehold of market-based consumer-driven commercial radio. Popular culture has been severely stunted by the narrow, money-driven focus of so-called popular radio and its promotional ties to commercial industries.

It is an unfortunate fact that only a slim portion of the population is lucky enough to be within the broadcast range of a free-form college radio station or other outlet for independent music and viewpoints. Thus the majority of radio listeners are never given a chance to sample anything outside the standard, accepted and popular, even though the selections repeatedly aired on commercial radio represent but a mere fraction of the spectrum of music being created, even within a single genre. LPFM could change that.

LPFM would open the airwaves to the energy and enthusiasm that exists in those who have continued to champion independent music amidst decades of deterrents. LPFM would not be the demise of commercial radio, it would merely add a new voice to the fray. Making the airways available to programming interests that have concerns outside the commercial-radio norm would present a new opportunity to stem the degenerating tide of our national cultural awareness.

As a Board Member of a Corporation that holds the operating license of a 720 Watt Class-A station I have a full understanding of the current structure of FM radio and its place in an urban community with already-crowded airwaves. Despite contrary comments from the establishment, it is my educated opinion that LPFM would be good for everyone in that it would give exposure to different ideas, allow truly alternative approaches to programming, and provide a forum for under-exposed music. In addition to being a distinctly positive experience for the majority of the listening audience, this could also help equalize the field of the entire music industry by enhancing the competition within a freer market.

As a weekly radio host and programmer with 15 years of experience in all aspects of the underdog world of college radio, I can say with certainty that there is enormous interest in a multitude of musical styles and alternative opinions that are never allowed airtime on commercial radio. Existing stations simply do not even attempt to address the requests of the under-acknowledged community of independent music fans. It is invalid to assert that commercial radio caters to popular preferences. Popularity is not only a relative term, it is meaningless without the context of comparison to a variety. Songs are often deemed popular BECAUSE they receive repeated airplay, regardless of listener interest.

As a hobbyist musician and participant in the creation of numerous recordings of underground music, I have first hand experience with the plethora of difficulties of gaining initial exposure to potential fans. But as a testament to the under-representation of the standard commercial fodder, I can happily say that with perseverance, it has been possible to exist outside the realm of big-league commercialism and still accrue an international audience that is not of insignificant size. It is a misnomer to relegate non-commercial music to an underground or counter-culture because the disenfranchised music fans are in actuality the silent majority. The interests of all would be better served by exposure to greater diversity.

Finally, as the owner and sole operator of a not-for-profit record label established to help provide exposure to exceptional music that would otherwise be stifled, I have expended great personal effort attempting to break through the barriers imposed by the intrinsic monopoly that links mainstream media with commercial music. Even within a purportedly progressive civic environment the overwhelming response of local press is to mollycoddle the commercial majority and rebuff productions by local independents. In the face of such constraints it is exceedingly difficult for independent music to gain enough exposure to sustain an awareness of its existence or gain a wider audience and acceptance. The potential increase in exposure of independent music afforded by the LPFM format could help overcome the prejudices of a peer-pressure society that primarily popularizes consumerism and conformity.

LPFM would provide—nationwide—a much needed opening for radio programming that is tuned to the desires of the actual community and not driven by decisions based on advertising and profiteering.

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