D. The first LPFM applications the FCC should process are those filed by minority broadcast training institutions

We have proposed a hybrid application acceptance procedure under which several sequential filing windows would be opened, with applications due on a first come, first served basis within each window. See pp. 26-28 supra. Minority applicants would receive neither a remedial nor a diversity-promoting advantage. As we noted, race-sensitive procedures for LPFM, except for MBTIs, are probably unnecessary because the barriers to entry that inhibited minority participation in full power radio would not exist for LPFM.

However, MBTIs face special barriers to entry that cannot be overcome by a window, first come, or hybrid application acceptance approach. Educational institutions are not suited to the rapid response that small nonprofits are famous for. Colleges and universities, especially state schools, must undergo budget reviews, trustee and legislative approval processes which can consume months or more. Universities do not turn on a dime. Many of them would need to overcome the historical lack of support of their boards and state legislatures for minority broadcast education. Even governing bodies not tainted by discriminatory intent would recognize that the legal environment which enabled them to create minority training programs in the early 1970s no longer exists. This would raise legitimate doubts among even the best intentioned people over whether an investment in minority broadcast training would ever be returned in the form of jobs for minority graduates.146/ On the

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146/ Before the EEO Rule was adopted, there were no MBTIs. They were founded expressly because their boards felt that, because of the EEO Rule, their graduates could find jobs. Now that we again lack an EEO Rule, MBTIs legitimately fear that history will repeat itself.

other hand, if minority schools' governing boards knew that the FCC might provide them with LPFMs, they might be more likely to create MBTI programs built around potential LPFM licenses. Similarly, minority broadcasters might be more likely to secure support for non-college based training schools if LPFMs were available.147/

Moreover, the financial and professional resources attendant to building an LPFM-enhanced training program are considerably more than the resources needed to operate a neighborhood LPFM which performs no training. First-come or short window licensing systems prefers those who can achieve rapid response. Such systems inherently disadvantage those who need time to develop the most outstanding, most needed LPFM applications, such as training schools enhanced by an LPFM facility.

MBTIs would have an especially tough time securing LPFM permits because of their locations in areas in which the FM spectrum is already tightly occupied. Most MBTIs are in large, spectrum-crowded southern cities such as Baltimore, Washington, Norfolk, Hampton, Greensboro, Atlanta, Tallahassee, Montgomery, Jackson, New Orleans, and Houston. The odds of winning an LPFM permit in these cities under a simple first-come, window or hybrid system are slight.

147/ There are three minority owned and operated nonprofit broadcast training schools in the United States: the African American Media Incubator in Washington, D.C., the Cleveland Talk Radio Training Consortium, and the San Diego Community Broadcasting School, each of whom has joined in these Comments. These institutions are vital in providing gifted and experienced employees for full power facilities. The need for these schools is overwhelming; each has far more demand for its services than it can satisfy. We need the Commission's help in creating an environment which could give rise to similar institutions in every major city. LPFM could be a key asset in generating full power broadcasters' support for these institutions.

There have been 13,000 expressions of interest for LPFM. See NPRM at 2476 ¶11. If our experience with Docket 80-90 and LPTV is an indication, these expressions of interest would understate (by at least a factor of two) the number of applications actually received. Assuming liberally that 4,000 LPFMs can be created, there might be 26,000 applications, 50 of which are filed by MBTIs. Let us also assume the best possible environment for the MBTIs -- that they miraculously overcome their financial and flexibility barriers and file applications competitively under first-come and within windows. Let us further assume (very optimistically) that the odds of winning an LPFM permit in a large city are no less than the odds of winning one anywhere else in the country. Even under these ideal conditions, the law of averages would yield eight LPFMs for the MBTIs. Eight LPFMs is hardly enough to begin the task of remedying the enormous present consequences of past discrimination against MBTIs in broadcast licensing. See pp. 34-63 supra. It follows, then, that the MBTIs would need additional help.

Consequently, we propose that the first window to be opened for LPFM service should be dedicated to MBTIs only. This procedure would guarantee that these institutions enjoy a reasonable opportunity to obtain LPFM permits to be used for student training. In addition to remedying past discrimination, a first window reservation for MBTIs would promote diversity by training minorities in broadcasting. It would also produce a vanguard of individuals with special experience in LPFM operations -- responding to the concerns of some that LPFM would be in need of experienced personnel. See NPRM at 2495 ¶28.

There is already a precedent for this first-window approach. In 1978, the Commission prrovided that tax certificate and distress

sale petitions would receive "expeditious processing."[148/] The "expeditious processing" policy is the privileges and immunities clause of minority ownership -- seldom invoked, but having profound value at the right time. This is that time. Expeditious processing is a tailor-made remedy for the time, money, flexibility and application quality constraints unique to MBTIs.

A first-window for MBTIs would not make up for the years of government complicity in denying these schools access to optimal high power licenses. LPFM stations would amount to only a first few cents on the dollar toward the satisfaction of a long due promissory note owing from the FCC to the MBTIs. Nonetheless, the insufficiency of a remedy is never a reason not to provide it. A bandage is some comfort to one having a deep wound. Unfortunately, the FCC is out of dressing for major wounds; there are almost no high power FM licenses still available in our major cities. LPFM is the only tool currently available. The FCC should the best job it can with the only tool it has.

This is a rare example of a win-win program which also would pass constitutional muster. At most, the program ought to be evaluated under intermediate scrutiny, since it is, at most, race-conscious without being race-preferential.[149/] But as shown below, the program should be evaluated under rational basis analysis

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148/ Minority Ownership Policy Statement, 68 FCC 2d 979, 983 (1978). See also Hagadone Capital Corp., 42 RR2d 632 (1978) (to promote minority ownership, Hawaiian AM station's nighttime authority petition was removed from the processing line and afforded expedited consideration).

149/ McLaughlin v. Boston School Committee, 938 F.Supp. 1001, 1008 (D. Mass. 1996) ("McLaughlin").

because race is not the basis for classification of the schools that would benefit from the program.

By legislative definition, the colleges which have been designated as historically Black, Hispanic and Native American are not defined based upon a racial classification, but by historical mission. These institutions do not draw their designation from the makrup of their student bodies, but from their historical mission. The schools could maintain their historical designation even if the predominant population were White, as long as the historic mission had been, and continues to be the education of minorities.150/ As a result, federally sponsored programs benefitting MBTIs have not been constittutionally questioned.

According to the Higher Education Act of 1965, an HBCU is "any historically Black college or university that was established prior to 1964, whose principal mission was, and is, the education of Black Americans, that is accredited by a nationally recognized accrediting agency or association determined by the Secretary to be a reliable authority as to the quality of training."151/ The statute similarly gives an historical designation to colleges or universities devoted to teaching Native American and Hispanics. An "Hispanic-serving institution," must be an "institution of higher education which "... (B) at the time of application, has an enrollment of undergraduate

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150/ In fact, several HBCUs have student populations that are less than 50% African American, including Kentucky State University and West Virginia State College. Bluefield State College, an HBCU in West Virginia, has an African American enrollment of only 7%. It has no minority administrators and only one recently-hired minority professor.

151/ Higher Education Act of 1965, as amended through June 1995. This definition was codified into §III, Part B by the "Higher Education Amendment of 1998, P.L. 105-244, 105th Congress, Title III, §301.

full-equivalent student that is at least 25 percent Hispanic students; (C) provides assurances that - (i) not less than 50 percent of its Hispanic students are low-income individuals who are first generation college student; and (ii) another 25 percent of its Hispanic students are either low income individuals or first generation college students..."152/ The Tribally Controlled Community College Assistance Act of 1978 assists a "tribally controlled community," an institution of higher education which is formally controlled, or has been formally sanctioned, or chartered, by the governing body of an Indian tribe or tribes..."153/

The Higher Education Act of 1965, which still serves as the primary vehicle for authorizing special federal programs and appropriations for HBCUs, Hispanic serving institutions and Native American Tribal Colleges, bases its funding on findings that are conscious of, but not dependent upon, the race of the majority of their students.154/

152/ Higher Education Act of 1965, §316 (a) [20 U.S.C. §1059c].

153/ Id., P.L. 92-189.

154/ These findings are:

(1) there are a significant number of institutions of higher education serving high percentages of minority students and students from low-income backgrounds, that face problems that threaten their ability to survive;

(2) the problems relate to the management and fiscal operations of certain institutions of higher education, as well as to an inability to engage in long-range planning and development activities, including endowment building;

(3) the Title III program prior to 1965 did not always meet the specific development needs of [HBCU and other institutions] with large concentrations of minority, low-income students;

[n. 154 continued on p. 70]

The federal government continues to assist these institutions. In 1994, an Executive Order required all procurement officials in the federal government to "[assist] SDBs, HBCUs and MIs in Federal procurement...(b) [establish]...particular goals for SDBs, HBCUs or MIs on an agency-by-agency basis; and (c) [establish]...other mechanisms that ensure that SDBs, HBCUs and MIs have a fair opportunity to participate in federal procurement."155/ Indeed, Congress has frequently enacted set-asides or other forms of statutory preferences for "socially and economically disadvantaged" including HBCUs, HSIs and NATCs. One sweeping regulation requires all federal agencies, to make a "25% allotment for institutional aid

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154/ [continued from p. 69]

(4) the solution of the problems of these institutions would enabled them to become viable, fiscally stable and independent, training institutions of higher education;

(5) providing assistance to eligible institutions will enhance the role of such institutions in providing access and quality education to low-income and minority students;

(6) these institutions play an important role in the American system of higher education, and there is a strong national interest in assisting them in solving their problems and in stabilizing their management and fiscal operations, and in becoming financially independent; and

(7) there is a particular national interest in aiding those institutions of higher education that have historically served students who have been denied access to post-secondary education because of race or national origin and who participation in the American system of higher education is in the Nation's interest so that equality of access and quality of post-secondary education opportunities may be enhanced for all students.

155/ Executive Order 12928, September 16, 1994, "PROMOTING DOCUMENT WITH SMALL BUSINESSES OWNED AND CONTROLLED BY SOCIAL AND ECONOMIC DISADVANTAGED INDIVIDUAL, HISTORICALLY BLACK COLLEGES AND UNIVERSITY, AND MINORITY INSTITUTIONS" at 1.

to minority and historically black colleges and universities."156/ Federal agencies have adopted individual goals and set-asides for HBCUs, HSIs and NATCs, including the Departments of Defense,157/ Energy158/ and NASA.159/ Other federal laws appear to have

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156/ 10 U.S.C. §1069. See also 20 U.S.C. §1112d ("special consideration" for teacher training program given to minority and historically black colleges and universities); 20 U.S.C. §5889 (c) (50% of subgrant funds for local reform and professional development to be awarded to institutions with disproportionate percentage of disadvantaged students); 20 U.S.C. §6031 (c)(5) (initiatives and programs to increase participation of "historically underutilized" minority researchers and institutions); 42 U.S.C. §293d (priority funding to institutions that increase enrollment of disadvantaged students in health profession programs by 20% over three years and benefits to be "equitably allocated among various racial and ethnic populations"); P.L. 103-322, 108 Stat. 1796, §31001 (10% of amount for contract and subcontracts for crime education and substance abuse programs to be expended on small businesses controlled by socially and economically disadvantaged individuals and minority educational institutions.)

157/ 10 U.S.C. §2323 establishes a goal of awarding five percent of the total value of Department of Defense (DOD) procurement contracts to minority firms, historically black colleges and university, and other minority institutions through fiscal year 2000. Up for renewal in FY00, it has the support of both parties, each of which has historically supported HBCU legislation.

158/ Ten percent of funding on contracts and subcontracts under the Energy Policy Act are to be awarded to disadvantaged business enterprises and minority educational institutions. 42 U.S.C. §13556.

159/ The NASA Administrator is required by 42 U.S.C. §2473b to annually establish a goal of at least eight percent of the total vaule of prime and subcontracts awarded in support of authorized programs to be made to small disadvantaged businesses and minority educational institutions. Twelve percent of National Science Foundation grants for research facilities modernization must be set aside for historically black and minority colleges and universities. 42 U.S.C. §1862d.

expressly encouraged federal assistance to HBCUs, HSIs and NATCs.160/

Federal programs set up in response to these statutes include those which are directed specifically at HBCUs, HSIs and NATCs, where they either compete for funds which are set aside for only these schools or participate to the exclusion of other types of SDBs. Examples are set out in the margin.161/ Consequently, HBCUs, HSIs and NATCs are eligible for federal assistance, including set-asides, without such assistance being considered race-conscious.

160/ See e.g., 10 U.S.C. §2191 (Secretary of Defense shall take "all appropriate action" to encourage minority applications for graduate fellowships in science and mathematics); 20 U.S.C. §§1134 et seq. (grants to Institutions and Consortia to Encourage Women and Minority Participation in Graduate Education); 20 U.S.C. §1135c-2 (Minority Science and Engineering Improvement Programs); 20 U.S.C. §1431(a)(7) (grants to minority higher educational institution for training in special education personnel); 20 U.S.C. §§2986(c), 2987(b)(2), 2988(b)(2)(F) and 2989(b)(5) ("special consideration" to be given demonstration projects and program in math and science serving minorities and other "historically underrepresent and underrepresented and underserved populations.")

161/ National Aeronautics and Space Administration (NASA)

In 1990, NASA's Office of Equal Opportunity Programs established the Minority University Research and Education Division (MURED) to "increase the Agency's responsiveness to Federal mandates related to Historically Black Colleges and Universities[,]... Hispanic Serving Institutions and Tribal Colleges and Universities." There are several programs in which HBCU compete for awards in institutional research, math and science education.

U.S. Department of Housing and Urban Development

Since 1970, HUD has set aside a pot of money for which only 105 selected HBCUs compete to receive for leveraging projects which are designed to improve their community. In FY99, the average award was approximately $300,000. With this money, the HBCU must find community partners which will help it develop areas of its community. These are typically used for residential developments.

[n. 161 continued on p. 73]

Nonetheless, even if our MBTI first-window proposal were erroneously considered race-conscious, its net impact would be similar to that of a race-neutral initiative. On balance, there would be "no disparate impact as to race in the application of the classification"162/ and, at most, intermediate scrutiny would apply.

A first window reservation for MBTIs would allow a small handful of predominantly minority institutions to win licenses they could not obtain otherwise. But the impact on LPFM as a whole would be very slight. MBTIs are unlikely to occupy more than a small percentage of the nation's LPFM stations. Since no particular nonminority would be displaced, the impact of a first window reservation would be minimal. Yet counterbalancing even that de minimis and diffuse impact on nonminorities are three attributes of a first window reservation for MBTIs that would help nonminorities.

First, grants to MBTIs would create training opportunities for both minorities and nonminorities. MBTIs have a race-related purpose, but MBTIs are open to all races equally. Each MBTI admits

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161/ [continued from p. 72]

Department of Education

DOE has a plethora of programs specifically aimed at assisting HBCUs, Tribal Colleges and Hispanic-serving Institutions in a wide range of areas including technology development; research development; teacher development, foreign language, early childhood training, construction and renovation of academic facilities; science and engineering; leadership and law school clinics. While most of these are set up and implemented through legislation, they are programs in which only HBCUs can participate.

In addition to these, there are initiatives at the Office of Personnel and Management, Department of Defense, Agency for International Development and others which are specifically directed at HBCUs.

162/ Jacobson v. Cincinnati Board of Directors, 961 F.2d 100, 102 (6th Cir. 1992) ("Jacobson"); see also McLaughlin, 938 F.Supp. at 1008 (program must impact all races equally).

nonminority students on an equal basis with minority students. Thus, a White student desiring broadcast training would not be harmed, and would more likely be helped, by a first window reservation for MBTIs.163/

Second, LPFM grants to MBTIs would assure nonminority broadcasters a flow of trained minority applicants, This resource would be useful to all broadcasters' efforts to adjust to a rapidly changing, more racially diverse audiences. Most broadcasters commenting in the EEO proceeding (MM Docket No. 96-16) state that they would like to hire more minorities.

Third, a first window reservation for MBTIs would yield MBTI graduates with experience in LPFM operation. Successor MBTI operators, including nonminorities, would be able to hire these individuals and immediately profit from their specialized training and expertise.

Thus, the benefits of this proposal to nonminorities at least counterbalance any de minimis and diffuse detriment to them. Consequently, the net impact of this proposal is similar to a race-neutral one, even if it is considered race-conscious. The standard of review should therefore be, at most, intermediate scrutiny.

163/ White students tend not to attend HBCUs for two reasons. In many cases, these students (or their parents or guidance counsellors) wish to avoid education in a setting in which they are in the minority. Second, HBCUs often lack the educational resources possessed by traditionally white institutions. See Ayers, supra (requiring more equitable distribution of educational resources among Mississippi public colleges). Typically, when HBCUs are able to develop educational programs competitive on their merits with those of traditionally White schools, White students cross the street and enroll at the HBCUs. Consequently, the enhancement of MBTI programs by adding LPFM facilities is likely to especially benefit White students by expanding their range of educational options.

Even if evaluated under strict scrutiny, the MBTI first-window proposal would pass muster. Remedying the present effects of past discrimination is a compelling governmental interest. We have thoroughly documented that the FCC itself was deeply complicit in that discrimination. See pp. 37-48 supra. Furthermore, the scope of the proposal is as narrow as possible. The number of eligible institutions is very small relative to the overall number of LPFM licenses issuable. All MBTIs are included within the class of victims of the consequences of the FCC's past discrimination or ratification of discrimination. The specific harm being remedied is directly addressed by the relief being proposed.

Moreover, race-neutral remedies are unavailable. The key race-neutral remedy, recruitment, is useless here because all of the MBTIs are already well aware of LPFM. However, they are handicapped in accessing LPFM for training because of the higher cost of training programs, the longer time needed to secure board or state legislative approvals, raise funds and prepare applications for filing windows or first-come procedures, and the unlikelihood that they would secure more than a handful of LPFM licenses in competition with all other applicants. See pp. 64-66 supra.

This proposal is governed by the Rule of Nonreversibility; see p. 18 supra. If the Commission does not adopt first-window relief for MBTIs, it would never be able to change its mind after the spectrum is filled. Thus, the Commission should enthusiastically embrace and adopt this proposal and fight to sustain it if necessary. Losing such a fight will yield up nothing the public already has. Winning such a fight will yield a future in broadcasting for thousands of minorities who otherwise would lack any realistic hope of working in this industry.

Accordingly, this initiative is both necessary and constitutionally possible. It has the added advantages of promoting diversity and providing a pool of individuals specially trained to help develop the new service.

To sum up, a first window reservation for MBTIs:

- is necessary to address the government's compelling interest in remedying the effects of past discrimination, there being no other means of achieving this objective;
- would promote diversity;
- would train a vanguard of persons with expertise specifically in LPFM operations, thereby assisting in the development of the new service
- would be easy to implement and very modest in scope;
- would be effective as a remedial program;
- would harm no individual nonminorities; and
- would help both minorities and nonminorities.

E. The FCC should create an incentive for full power commercial broadcasters to assist minority broadcast training institutions

The NPRM asks whether there might be any "possible cooperative arrangements (short of attributable interests...) among LPFM licensees that might facilitate the new service's development without unduly diluting its benefits[.]" Id. at 2495 ¶58. The answer is unequivocally yes. The Commission should permit joint venture arrangements that reward and incentivize commercial broadcasters to assist MBTIs in training students.

History has shown that the most successful minority ownership initiatives were designed to foster trade between minorities and nonmiunorities to the benefit of both. The tax certificate policy rewarded those who sold stations to minorities, and also assisted minorities in buying stations. The distress sale policy enabled a

troubled broadcaster to exit the industry with its head held high and its pockets not entirely emptied.

Commercial broadcasters already help MBTIs in important ways. Many communications companies were instrumental in creating and sustaining MBTI programs; for example, Gannett and Post-Newsweek at Howard, Southwestern Bell (SBC) at Prairie View; Cox and Turner at Clark-Atlanta. The non-college based minority training schools in Washington, Cleveland and San Diego could not exist without the generous financial, in-kind and human resources support of enlightened commercial broadcasters, particularly CBS Corp., AMFM, Inc. and Clear Channel Communications. These companies would do more if they could, and the Commission can help make it possible for them to do more.

In this spirit, we advocate a procedure which would reward commercial broadcasters for assisting in MBTIs' efforts to train minorities. We propose that to the extent that a commercial broadcasters helps an MBTI to train students in broadcast sales, the commercial broadcaster should be permitted to place a limited amount of sales inventory on the MBTI's LPFM station and share the proceeds of those sales equally with the MBTI.164/

Lord knows that the single greatest human resource need of every commercial broadcaster is trained salespeople.165/ Sales experience in other industries does not always translate easily into

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164/ To preserve the predominately noncommercial nature of these stations, we propose that no more than 49% of the MBTI's total air schedule could include this advertising.

165/ The Radio Advertising Bureau (RAB) has led the way in addressing this serious problem. It has sponsored job fairs across the country, often in cooperation with MMTC, and it is opening its own sales academy in Texas this fall.

broadcasting, which has a language of its own. Every good salesperson knows how to schmooze and how to close, but even the most successful automotive or appliance sales executive seldom knows what below the line means, where a 60 dbu contour is, or what CPM, TSA, TSL, DMA or AQH stand for. She won't know how to make cold calls, how to explain a format, or how to create or price a specialized schedule. The only way to learn these things is to sell and schedule airtime on a real radio station.

Thus, an otherwise noncommercial LPFM operated by an MBTI would need to be authorized to sell and broadcast some ads. To make this possible, the FCC should carve out a very narrow exception to the noncommercial status of LPFM stations. Under this exception, commercial broadcasters assisting MBTIs would be permitted to place a modest amount of advertising inventory on an MBTI's LPFM station in instances where placement of this inventory would help the MBTI train students in radio sales.

First, this initiative would encourage commercial broadcasters to help MBTIs develop first rate broadcast sales programs.

Second, it would help the industry have access to a large number of highly trained radio salespeople.

Third, it would help bring commercial broadcasters into direct contact with MBTI students and faculty. This would facilitate the creation of mentoring networks to help students make the transition to broadcast careers.

Fourth, it would give community-minded commercial broadcasters an opportunity to earn a modest profit from some LPFMs -- "doing good and doing well" at the same time.

Fifth, it would help the MBTIs financially sustain and grow their schools as some advertising revenue is plowed back into their nonprofit training programs.

By adopting this proposal, the Commission would make an already worthy initiative even more closely focused toward the goals of diversity, inclusion, and democratization of the airwaves.

Conclusion

We are confident that full power broadcasters will ultimately recognize LPFM as a great savior and invigorator of radio. Someday, they will wonder why they ever doubted the value of this new service -- just as most full power television broadcasters now appreciate LPTV and wonder why they once opposed it.

Certainly LPFM is no substitute for access to full power radio. We will always keep our eyes on the prize of full power radio. No proposal should be rejected merely because it does not solve every problem forever and all at once.

The creation of LPFM would be the landmark achievement of this Commission. By creating LPFM, the FCC would strike a mighty blow for democracy.

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ANAYLSIS OF RADIO STATION OWNERSHIP: HBCU'S VS. STATE COLLEGES & UNIVERSITIES

HBCU's:	Number of Stations:	28
Mean Sign-on date:		1980
Mean Power Level:		33.8 kw
Mean Antenna Height:		273 ft.

Other Colleges in States with HBCU's that have stations: 29

Mean Sign-on date:	1970
Mean Power Level:	40.57 kw
Mean Antenna Height:	671.4 ft.

HISTORICALLY BLACK COLLEGES & UNIVERSITIES	SIGN-ON DATE	POWER LEVEL	ANTENNA HEIGHT
Alabama A&M University (WJAB-FM)	May 9, 1991	100 kw	334 ft.
Alabama State University (WVAS-FM)	June 15, 1984	80 kw	347 ft.
Gadsden State Community College (WSGN-FM)	Feb. 11, 1975	6.3 kw	520 ft.
Oakwood College (WOCG-FM)	Dec. 1978	25 kw	23 ft.
University of Arkansas at Pine Bluff (KUAP-FM)	1995	6 kw	285 ft.
Howard University (WHUR-FM)	Dec. 10, 1971	24 kw	669 ft.
Clark Atlanta University (WCLK-FM)	Apr. 10, 1974	2.5 kw	300 ft.
Savannah State University (WHCJ-FM)	August 18, 1975	6 kw	100 ft.
Morgan State Univ. (WEAA-FM)	Jan. 10, 1977	12 kw	220 ft.
University of Maryland Eastern Shore (WESM-FM)	Mar. 29, 1987	50 kw	347 ft.
Alcorn State University (WPRL-FM)	Oct. 12, 1987	3 kw	300 ft
Jackson State University (WJSU-FM)	Aug. 1975	3 kw	203 ft.
Mississippi Valley St. Univ (WVSD-FM)	June 23, 1991	3 kw	292 ft.

Lincoln Univ. (KJLU-FM)	Aug 73	40 kw	510 ft.
Fayetteville State Univ (WFSS-FM)	Dec 7, 1977	100 kw	440 ft.
North Carolina A&T St. Univ. (WNAA-FM)	1979	10 kw	467 ft.
North Carolina Central Univ. (WNCU-FM)	Aug 1995	50 kw	433 ft.
Shaw Univ. (WSHA-FM)	Nov. 18, 1968	12.5 kw	453 ft.
Winston-Salem St. Univ. (WSNC-FM)	1982	125 w	92 ft.
Central State Univ. (WCSU-FM)	Dec 15, 1968	1 kw	150 ft.
Langston Univ. (KALU-FM)	Mar 3, 1975	10 w	77 ft.
South Carolina State Univ. (WSSB-FM)	Mar 15, 1985	90 kw	225 ft.
Fisk University (WFSK-FM)	May 15, 1973	700 w	6 ft.
Texas Southern University (KTSU-FM)	Oct 1973	18.5 kw	285 ft.
Wiley College (KBWC-FM)	Mar 1977	100 w	110 ft.
Hampton Univ. (WHOV-FM)	Mar 5, 1964	2 kw	200 ft.
Norfolk State University (WNSB-FM)	Mar 22, 1980	920 w	154 ft.
Virginia State University (WVST-FM)	July 12, 1987	100 w	120 ft.

STATE COLLEGES & UNIV.	SIGN-ON DATE	POWER LEVEL	ANTENNA HEIGHT
University of Alabama (WBHM-FM)	Dec. 1976	32 kw	1,214 ft.
Jacksonville State Univ. (WLJS-FM)	Sept. 29, 1975	3 kw	246 ft.
University of Arkansas (KUAF-FM)	Jan. 15, 1973	60 kw	1, 105 ft.
Arkansas State University (KASU-FM)	May 17, 1957	100 kw	689 ft.
Humboldt State University (KHSU-FM)	Oct. 1960	9 kw	1,490 ft.
Univ. of Delaware (WVUD-FM)	Oct. 4, 1976	1 kw	135 ft.
Univ. of FL. (WUFT-FM)	Sept. 27 1981	100 kw	771 ft.
Univ. of FL-Gainesville (WJUF-FM)	Oct. 1, 1995	4.5 kw	354 ft.
Univ. of Central Florida (WUCF-FM)	Jan. 30, 1978	40 kw	194 ft.
Florida State Univ. (WFSU-FM)	Oct. 14, 1990	9.5 kw	1,243
Univ. of South Florida (WUSF-FM)	Sept. 1963	100 kw	941 ft.
Univ. of GA. (WUOG-FM)	Oct. 16 1972	9.5 kw	180 ft.
GA State Univ. (WRAS-FM)	Jan 18, 1971	100 kw	436 ft.
State Univ. of West GA. (WWGC-FM)	Feb 19, 1973	500 w	494 ft.

Louisiana State Univ. (KLSA-FM)	1987	100 kw	1243 ft.
Univ. of MD-College Park (WMUC-FM)	Sept. 10, 1979	10 w	3 ft.
Frostburg State Univ. (WFWM-FM)	April 1986	150 w	1242 ft.
Salisbury State Univ. (WSCL-FM)	May 29, 1987	33 kw	600 ft.
Towson State Univ. (WTMD-FM)	Feb. 12, 1976	10.16 kw	236 ft.
Michigan State Univ. (WDBM-FM)	Feb. 24, 1989	2 kw	279 ft.
Mississippi State Univ.	March 1994	14.1 kw	449 ft.
Univ. of North Carolina at Chapel Hill (WUNC-FM)	Nov 3, 1952	100 kw	1,361 ft.
Univ. of North Carolina at Greensboro (WUAG-FM)	July 20, 1964	18.1 w	230 ft.
North Carolina State Univ. (WKNC-FM)	1966	3 kw	259 ft.
Ohio Univ. (WOUC-FM)	May 11, 1987	5 kw	500 ft.
Univ. of S.C. (WUSC-FM)	Jan 17, 1977	2.5 kw	233 ft.
East Tenn State Univ. ((WETS-FM)	Feb. 26, 1974	66 kw	2,273 ft.
Univ. of Texas-Austin (KUT-FM)	Nov 10, 1958	100 kw	680 ft.
Univ. of VA. (WTJU-FM)	May 10, 1957	1.5 kw	305 ft.