As a previous commenter in this proceeding, I wish to express my extreme disappointment with the actions of some members of the broadcasting community in their misrepresentations and deceptive lobbying against the LPFM initiative. An excellent example is the impetus for the comments filed by Ms. Felicia Grayson of Keene, NH, on April 28, 1999.

In her comments to the Commission, Ms. Grayson states that she opposes the LPFM initiative out of concern that a LPFM licensee might interfere with her enjoyment of WCRB, a Boston commercial broadcaster. This concern stems from a letter she received from WZID, a New Hampshire commercial broadcaster, in regard to a translator WZID had previously employed on WCRB's frequency.

Ms. Grayson attaches the letter to her comments. It charts a convoluted course to raise fear regarding the low power initiative, including use of the device of categorizing any potential licensee as a "special interest group." That phrase has become popular-culture code for anyone you disagree with -- liberals, if you're a conservative; conservatives, if you're a liberal; Christians; Moslems; Nazis; whoever. It is a catchall phrase designed to prejudice the reader against any possible user of one possible frequency, and it is a gross distortion. As a potential candidate for an LPFM license, I find it personally offensive. It is also a hypocracy,
since if WZID were itself not a special interest, it would not take an interest in this proceeding.

The Communications Act of 1938 charged broadcasters with acting in "the public interest, convenience, and necessity." The spirit of that Act endures, but many broadcasters, especially those employing "music and commercial and nothing else" formats, have shunned that responsibility. The Commission's low-power FM initiative proposes to create a space on the radio dial where that charge can be fulfulled. Undoubtedly, some groups will use this franchise to promote a point of view that Ms. Grayson, you, I, and the station manager of WZID will all find objectionable -- our Constitution virtually guarantees that. But it is a shame to incumbent licensees seek to pre-empt others from obtaining a new means to exercise their Constitutional rights of speech, especially by using the fear of what might be said to proscribe the many service-minded potential licensees from the opportunity to serve their community in the unique way that only radio allows.

Respectfully submitted,
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