

The following is my reply to comments by opponents of the NPRM for 99-25.

Current station fear of competition is simply not a valid argument to stop the FCC from approving the NPRM. For example, McDonalds can't stop another fast food franchise from popping up if the market chooses to support it, so we shouldn't stop LPFM stations that find an audience because community members dislike their current choices.

Many station owners (including rural stations) fear competition, claiming competition could cost them their business. Let's examine their argument.

An LPFM with less than a 9 mile coverage area may attract small local advertisers who can't afford current station ad prices because the larger station reaches outside their target audience. But since these small businesses weren't advertising on radio previously the larger station won't lose any business because they never had it in the first place. If anything, it may add profits to their station because after the business sees the success of LPFM ads they may choose to spend money on the larger station to maximize their reach.

One way a small LPFM may obtain an audience is by narrowcasting to a specific community niche. While a few advertisers may target this small niche, the larger mainstream broadcasting station will continue to attract the vast majority of advertising dollars because it will reach a wider audience that is not so narrowly focused.

For the sake