

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 of their argument, let's pretend a small LPFM is able to take away a large percentage of a station's advertising base and a large percentage of listeners from the larger station. The only way this would occur is if the traditional station simply wasn't meeting the needs of the community. Creating another reason the FCC should move quickly so the community can be properly served. It may also mean the traditional station is overpricing itself and a revamped management strategy and budget may be necessary.

The only argument that holds credence is the fear of interference. But the initial FCC test shows interference would be minor and other studies and engineers say inexpensive filters placed at area stations could eliminate noticeable interference. I presume the NAB study didn't consider the addition of such filters and I hope that the commissioners are cognizant of this fact. If such filters end the interference concerns, nothing should stop the implementation of the FCC's NPRM on LPFM. Directional antennas should also be allowed to maximize the signal and reduce interference.

Other groups argue that LPFM should only be non-commercial. For stations on the dial in the education band I agree. But LPFM stations falling in the dial between 92-108 MUST be given the option to compete and must allow for commercial revenue. Many Universities and Churches who build an LPFM station outside of the education band can choose to make the station non-commercial, but that decision should be up to the owner.

Please don't forget that one reason the FCC is even considering 99-25 is because it wants to encourage minority ownership and listener options. The only people who'd choose to start an LPFM if they couldn't make a profit would be the wealthy, not-for-profit

organizations, corporations or large public institutions. Once again keeping small business people (minority or otherwise) out and hampering alternative programming options.

Limiting stations to only non-commercial would also effect the quality of many stations not purchased by already wealthy individuals or groups. Possibly leading to poor quality and unprofessional stations that don't serve the community to the fullest extent possible since the owner may not understand the broadcast industry and responsibilities involved in owning and running a station. Limiting stations would also destroy the training ground of future broadcasters that LPFM could create.

Another point I hope the commission will consider when deciding the future face of LPFM is who deserve to be protected. Hopefully, my example will showcase my argument.

Someone living in Springfield, IL is 100 miles St. Louis, MO. While some St. Louis stations can reach Springfield, interference concerns should not stop an LPFM from being created in Springfield. Springfield area stores do not advertise on St. Louis radio and St. Louis stations do not target Springfield advertisers and listeners, and hold no station promotions in Springfield. Protecting stations in Springfield from interference is one thing, but areas clearly and obviously outside a station's core and target audience should not be protected.

In regards to ownership rules, to ensure pro-active community stations and a professional quality, owners should be allowed to own more than one station, and live out of the LPFM coverage area. The NPRM suggests a 10-station limit, and I believe such a decision is wise. A small regional franchise owner or management team does not need to be physically present to produce a station that's personalized for a specific community. If the station fails to remain clearly connected to the community, the LPFM will fail. Regional owners who forget this will see their investment fall apart.

I compliment the NPRM on it's quick windows for licensing online and on it's stand that Construction Permits should not be hoarded in hopes of reselling them for profit. A one-year building period or forfeiture of the license also sounds fair.

I'd also like to note my surprise and disappointment with organizations such as the National Association of Broadcasters. While I understand and commend them for protecting current member stations, they failed to see the potential of thousands of new station employees who could be perspective members and convention goers. I believe the NAB lost an excellent opportunity to ensure spectrum integrity while keeping a door open to future broadcasters. Many future LPFM owners will not forget the NAB's efforts when the organization later invites them to become members.

Finally, I'd like to take this last opportunity to encourage the FCC to approve the creation of commercial Low Power FM service.