

I am in favor of a new class of radio stations, specifically low power FM (LPFM). The current state of broadcast radio as presented by incumbent broadcasters is almost devoid of value and in most cases is not serving the communities of license, merely the shareholders' interests. Incumbent broadcasters both large and small claim that competition from LPFM stations will hurt their profits or put them off the air altogether. It is not the role of government to insure success in business; if the incumbent stations lose out that is because they are not providing a service that the listening public desires. LPFM stations, being inherently local, have a greater incentive to serve their own communities. With that in mind, there needs to be a rule regarding locally-generated programming to insure that an LPFM station does not become a translator or a drone providing only a satellite feed.

Several commentators are requesting that yet another time extension be granted on this NPRM because proposed in-band, on-channel (IBOC) digital radio systems are under development. This system is and will be on the drawing boards and in the labs for years to come. There is no need to delay rulemaking regarding LPFM simply because an unproven technology MAY exist in the future. The responsibility for developing a system compatible with current conditions rests squarely on those who are developing the system and not those who are or will be on the air. The benefits of LPFM to the public are clear and immediate; the benefits of IBOC are unknown, and in my opinion, dubious. Therefore, I urge the Commission not to grant any further time extensions regarding this matter.

The public has spoken overwhelmingly on this issue by way of the many comments filed with the Commission and by the rise in "civil disobedience" in the form of unlicensed broadcasting. I am in no way in favor of "pirate radio", but I am in favor of an increased and more diverse number of voices on the public's airwaves. For this reason I urge the Commission to implement rules regarding low-power FM in an expeditious manner.

Respectfully,  
Erich Loepke