

Before the  
Federal Communications Commission  
Washington, DC 20554

In the Matter of: )  
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Creation of a Low Power Radio Service ) MM Docket 99-25  
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To: FCC / Mass Media Bureau

Reply Comments in regards to MM Docket 99-25

Submitted by: Americans for Radio Diversity (ARD)

Americans for Radio Diversity (ARD) is a nonprofit organization, composed of concerned radio listeners and consumers, dedicated to promoting community orientated public and commercial broadcasting. In interest of this purpose, ARD submits the following comments in response to comments currently filed in the MM 99-25 proceeding.

Response to Comments filed by Corporation for Public Broadcasting on August 2nd, 1999:

The Corporation for Public Broadcasting (CPB) certainly has commendable goals and has shown beneficial impact on many radio listeners but it should be remembered that it was largely due to efforts by CPB that the Class D classification was removed in 1978. This move forced many low-power broadcasters and educational institutions to give up their broadcast voice and gave the CPB the ability to set up their far-reaching network of translator stations, thereby reducing the number of diverse voices on the airwaves.

CPB also has to be taken to task for suggesting that there are "technologies other than FM radio that are better suited" to reaching an audience and claiming that these technologies [ie: internet] "are not crimped by spectrum scarcity or high capital expenditures." This is an utter fallacy.

The capital expenditures required for internet access are far too limiting to middle- to lower-class members of the population. A multimedia computer at best costs several hundred, if not thousand, dollars and then requires a monthly subscription fee for an internet provider of approximately \$20.00 a month. This will allow the user, at best, to receive streaming audio of less than AM-broadcast quality which is not guaranteed against interruption or break-up. Trying to attain FM or CD-quality programming over the internet requires a dedicated high-speed connection that can cost anywhere from \$30.00 to \$800.00 per month above the already stated prices. Compare to the cost of a common portable radio and a set of batteries. (Besides, as CPB states, the average commute distance is 12 miles -- how will people listen while mobile?)

Has the CPB also forgotten that the P in their initials stands for PUBLIC? The airwaves are a public resource and under no circumstances should we, the people,

give up our right to that resource in exchange for "better suited technologies" that force "public" access only through private entities.

Sincerely,

Jeremy Wilker, co-founder Americans for Radio Diversity

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