

I wish to express my strong support for proceeding 99-25, the creation of a low-power FM service for the following reasons:

1. It provides a remedy for the trend of decreasing locality of program content seen in commercial radio, especially insofar as station ownership is becoming increasingly concentrated in fewer, and generally non-local, hands. The local character of radio is one of its unique strengths that deserves to be protected from format and content homogenization.
2. Making it easier for schools and other organizations to have a local voice serves the community at large. In addition, more stations mean more opportunities to train qualified radio operators and talent, which may increase the size and quality of the radio talent pool.
3. It is this petitioners' opinion that much talent remains undiscovered precisely because of the high barrier to entry into commercial and the larger non-commercial stations. This talent can be encouraged to develop in school and civic stations.
4. The objection that these low-power stations will cause unacceptable interference with existing licensees and create chaos is an alarmist position. Certainly, if the Commission were to license LPFM stations directly on the frequency of other local high-powered stations, there would be a (mutual) interference problem, but as the Commission will be licensing said stations, they will obviously be assigned frequencies used by stations outside their primary coverage area, not within it.

In summary, there is much to gain by permitting LPFM operations.

sincerely yours,

Ross Archer