

Dear FCC,

These comments are filed on behalf of Duquesne University, Licensee of WDUQ-FM in Pittsburgh, PA in reply to filings regarding the proposed Low Power FM service.

We strongly support the initial Comments in this proceeding filed by the Public Radio Regional Organizations (the "PRROs"), the Station Resource Group ("SRG"), the Corporation for Public Broadcasting ("CPB"), and National Public Radio ("NPR").

Public radio, with significant audiences and significant community support, has shown how to make public service broadcasting vital and viable. The LPFM proposal puts this service at risk. The current LPFM model will lead to significant erosion of our signal and service to the community. while offering no guarantee of better community service.

PUBLIC RADIO AND SERVICE TO THE COMMUNITY

In terms of the concept of providing service to the community and allowing voices to be heard, the LPFM proposal seems much like the mission of public radio itself. But it is inconceivable that highest ideals of the LPFM proposal can be guaranteed.

As with all other radio today, the FCC cannot mandate programming. While local communities might gain some service of value with LPFM, it seems just if not more likely that a CD jukebox or other unlocal content will make up the programming. Given the real costs of running a radio station, the lowest cost options may be the only successful choices.

All microbroadcasters may not be hobbyists, but many are. Neither the FCC proposal for LPFM or any of the comments I have read offer any enforceable LPFM plan that guarantees the kind of meaningful community service that is so nobly hoped for.

A MODEL OF SERVICE

WDUQ has volunteers on our staff as well as paid professionals. We have a serious commitment to news, information and giving voice to people and issues in the community that are otherwise unheard. We are also the only voice for jazz in one of the greatest jazz cities in the world.

We also help support the Reading Information Service for the Pittsburgh region via subcarrier.

GRAVE TECHNICAL CONCERNS

National Public Radio (NPR), in conjunction with the Consumer Electronics Manufacturers Association (CEMA) and the Corporation for Public Broadcasting (CPB), recently concluded technical studies that show that the proposed LPFM service will create interference.

Based on the technical problems for our main FM service, the impact on WDUQ's subcarrier reading service for the blind and the unknown impact on

future digital audio service, we must strongly object to the implementation of LPFM.

Finally, low-power FM stations will supplant or degrade FM translator service. While not an issue for WDUQ, LPFM will directly threaten universal service and our ability to provide free, quality programming. Eliminating translators also will significantly diminish the substantial federal, state, and community investments that have been made in the public radio system infrastructure.

While the stated policy objectives of LPFM are laudable, implementation of the FCC's proposal will negatively impact WDUQ's ability to serve our community and diminish the signal clarity that public radio listeners across America depend upon.

Sincerely,

Scott Hanley
General Manager
WDUQ-FM
Duquesne University