

American Federation of Labor and Congress of Industrial Organizations



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September 17, 1999

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Magalie Roman Salas
Office of the Secretary, TW-A306
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Notice of Proposed Rulemaking, "Creation of
Low Power Radio Service"
MM Docket No. 99-25

Dear Ms. Salas:

We write on behalf of the American Federation of Labor and Congress of Industrial Organizations (AFL-CIO) in reply to original comments filed with the Federal Communications Commission regarding the Commission's notice of proposed rulemaking establishing rules authorizing the operation of low power FM radio stations. Through this rulemaking the Commission seeks to provide new opportunities for community-oriented radio broadcasting; to foster opportunities for new radio broadcast ownership; and to promote additional diversity in radio voices and program services. The AFL-CIO supports the Commission's goals embodied in the proposed rulemaking, and we encourage the Commission to act expeditiously to draft rules establishing a new system of low-power, community-oriented radio.

Following the enactment of the Telecommunications Act of 1996, the Commission significantly relaxed its restrictions on the number of radio stations a licensee could own and operate in individual radio markets. As a result, we have witnessed increased ownership consolidation in the hands of a few wealthy multinational corporations. These centrally-programmed stations dominate the airwaves and effectively deprive the listening public of alternative sources of news, information and entertainment. Moreover, these megastations have virtually eliminated radio as a vehicle of expression for workers, minorities, community groups and others in the political and cultural marketplace. Today, millions of people across our nation

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are longing for local radio programming that fully reflects the diversity of needs, interests and voices in our local communities.

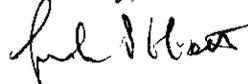
Historically, the labor movement has initiated and supported efforts to use radio as an organizing tool and as a medium for the people. For example, in 1926, the Chicago Federation of Labor launched radio station WCFL, a listener-supported station dedicated to labor and public affairs programming. In its early years, WCFL used the airwaves to help organize workers, while simultaneously promoting public awareness and support of the union movement and worker issues. Today, a handful of union radio programs continue this proud tradition by offering information and viewpoints that speak to the needs and interests of working families and their communities.

Unfortunately, programming with such local flavor is now scarce on the radio dial. The concentrated ownership of commercial radio by corporate conglomerates has simply made it too expensive for working people and other individuals to access the airwaves. Many individuals and community groups that are interested in radio broadcasting cannot afford to enter the industry or to take advantage of the limited leasing opportunities at established radio stations. Moreover, those with alternative viewpoints who do have the means to lease air time must gain the prior approval of image-conscious corporate censors before being allowed to air their views. The creation of non-commercial low power FM radio service would provide an inexpensive, yet valuable alternative to the current commercial radio format. We therefore support the Commission's proposal to create a low-cost means for workers, community groups, and others to join the public debate and to enhance the diversity of voices on the public airwaves.

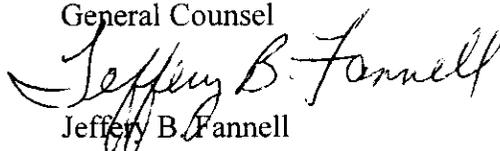
The AFL-CIO encourages the Commission to adopt rules establishing non-commercial low power radio service, and in doing so, to create guidelines that would ensure that all newly-created low power FM radio outlets are owned and operated by the people in the communities they serve. We also urge the Commission to establish application and licensing procedures that are clear, direct and readily accessible to the general public. As we usher in this new era in radio it is essential to ensure that all interested individuals and community groups have a bona fide opportunity to share in this exciting enterprise.

The AFL-CIO appreciates the Commission's careful consideration of these comments.

Yours truly,



Jonathan P. Hiatt
General Counsel



Jeffery B. Fannell
Associate General Counsel