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Telephone (212) 862-7474 - 5
Fax (212) 862-3255

FOUNDED 1808 - ERECTED 1923

THE ABYSSINIAN BAPTIST CHURCH

132 ODELL CLARK PLACE
(Formerly 132 W. 138th Street)
NEW YORK, N.Y. 10030

CALVIN O. BUTTS
Pastor

EDWILLARD GREEN
Chairman, Deacon Board

VENIA R. DAVIS
Church Clerk

JEWEL T. THOMPSON, Ph.D.
Minister of Music

ROBERT L. GORE, JR.
Chairman, Trustee Board

FLOYD UMBLES
Treasurer

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JUL 30 1999
FCC MAIL ROOM

July 27, 1999

In the matter of:
(FCC proposes licensed low power FM radio)
Docket: MM 99-25

To: The Federal Communications Commission

Comments of: Abyssinian Baptist Church
132 Odell Clark Place
New York, NY 10030

On behalf of The Abyssinian Baptist Church ("Abyssinian"), we are pleased to comment on the above referenced Notice of Proposed Rule Making ("NPRM") by the Federal Communications Commission ("FCC" or "the Commission").

Abyssinian, which has been in continuous operation since 1808, is one of the premier institutions in the church world. The rich history and the national leadership which has emerged from her pulpit are vital parts of the American worship, cultural and political experience.

Abyssinian strongly supports the creation of new classes of service in the existing FM radio band. Low Power FM ("LPFM") will provide a low-cost means of serving urban communities and neighborhoods around the United States, and it will go a long way toward addressing the unmet needs for community-oriented radio broadcasting. It is Abyssinian's belief that LPFM, as discussed in the NPRM, will foster opportunities for new radio broadcast ownership and promote additional diversity in radio voices and program services.

In the Village of Harlem in New York County, in New York State, where Abyssinian has served its community for many generations, LPFM has the potential to unlock the sometime latent, but always vibrant, creativity and spectacular talent of the people of Harlem. LPFM can help to unite our local residents, while ensuring that their collective needs and concerns are addressed. We look forward to the creation of these new classes of service, and Abyssinian respectfully requests a license to broadcast in the LPFM arena.

In order to fulfil its promise, LPFM stations must not be permitted to operate as translator stations re-transmitting the programming of full-power stations. LPFM will improve the quality of life for local communities by focusing on local community needs and information. Broadcast of the programming of a station with a broader audience and wider reach would

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undermine efforts to build community-based radio and invalidate virtually all of the ways in which LPFM will prove valuable to local communities like Harlem. Abyssinian supports the FCC's proposal to prohibit the use of LPFM as an additional frequency for a full-power station.

The new classes of service proposed by the FCC should be available only to not-for-profit organizations, and those organizations should be permitted to generate advertising revenue through their broadcast efforts. Not-for-profit religious, cultural and educational organizations that have a proven history of devotion to their communities are the most likely institutions to live up to the goals of the FCC with regard to LPFM. Because these types of institutions focus on community needs above all else and because they refuse to permit "profit over principle" thinking to affect their decision making, organizations like Abyssinian will be the best licensees for LPFM. Clearly, for-profit entities will face much of the same profit pressures that prevent currently existing radio broadcasters from adequately serving the community and neighborhood needs that LPFM will address. Because the LPFM stations will create new advertising space, and because advertising revenues generated by the not-for-profit owners of the LPFM stations can be used to improve content quality and to better accomplish their owners' community-minded mission, these new stations should be permitted to generate advertising revenue. Therefore, while only not-for-profit organizations should be considered for licenses, the stations should seek out advertisers whenever possible.

The FCC should prohibit existing broadcasters from owning LPFM stations and should prohibit anyone from owning more than one LPFM station in the same community. In order to meet its goal of bringing ownership diversity to radio broadcasting, the FCC must ensure the diversity of owners among LPFM stations and ensure that LPFM brings new broadcasters to the airwaves to focus on local communities. Permitting existing broadcasters to enter the LPFM arena would be contrary to the FCC's diversity goal and would further entrench existing full-power broadcasters whose failure to address local community needs has brought about the need for LPFM. Also, allowing new LPFM braodcasters to control more than one LPFM frequency in a given community will limit diversity and allow fewer voices to be heard. Therefore, Abyssinian supports these two diversity-enhancing ownership restrictions.

Because the FCC is required by law to protect the radio broadcast spectrum from interference, and because the FCC has successfully lived up to that mandate for many years, we trust that the Commission will implement the creation of LPFM radio classes in a manner consistent with its record of excellent stewardship of the airways and consistent with the superlative talent and integrity of the current leadership of the Commission.

In Harlem, our community needs LPFM radio; and we hope that the Commission will consider the views of Abyssinian as the Commission undertakes its decision-making in the weeks that lie ahead.

Sincerely,

Calvin O. Butts
Pastor

COB:FAD