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JAZZ MUSIC RADIO
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July 27, 1999

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

The Honorable William Kennard
Chairman
Federal Communications Commission
445 12 St. SW
Washington, DC 20554

Dear Chairman Kennard:

The Low Power Radio Coalition strongly encourages the Federal Communications Commission to explore the implementation of a new class of Low Power FM radio stations. Radio is our national medium – according to a recent study, 95% of American adults listen to radio daily. We represent a broad nationwide constituency that could, if provided the opportunity, utilize broadcast radio to serve the communities in which we work and live.

Low Power FM stations could have significant impact throughout the nation by both building on existing effective models and expanding the use of radio into new arenas, such as the following:

Helping Local and Regional Government Communicate with Citizens:

Low Power FM will help realize broadcast radio's potential as a communications tool for local governments, including police departments and social service agencies. Many communities creatively and aggressively program Public, Education and Government (PEG) cable television channels to provide residents with useful information. These programs do not reach the millions of Americans who choose not to or cannot afford to subscribe to cable television. However, these persons have access to radio.

Low power FM radio could assist police departments in their community policing programs by simulcasting existing cable television call-in shows on FM radio. Similarly, local governments can take advantage of radio's near-universal penetration to factor Low Power FM into emergency plans. For example, in large media markets, specific counties or neighborhoods often are impacted by power outages. Low Power stations targeting a specific neighborhood, small town or county could broadcast information on shelters, updates on utility company progress, and weather reports.

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Information on Public Safety and Transportation:

Low power FM radio will provide an effective FM alternative to the limited radio facilities currently used by public safety and transportation service entities. This new service will provide critical real-time information to travelers confronting emergency situations, traffic patterns and accidents. For numerous transportation entities, broadcast radio is the only way to convey messages on a timely basis. Necessary communications include the announcement of not only unforeseen incidents and accidents, but also planned activities, such as construction schedules and the suggestion of alternate routes. Low power FM can ensure that critical messages reach motorists and will improve safety and efficiency on the nation's roads.

New Opportunities for Schools and Universities:

Throughout the country radio thrives in secondary and higher education, both as an educational tool and a hub for local communities. Many schools and universities, however, either do not have stations or are limited to operating cable, carrier current or day-time only stations due to lack of available FM spectrum and the costs associated with maintaining a full-power signal. Low Power FM radio stations will create new opportunities for schools to make use of the FM band.

Currently, over 140 colleges and universities operate carrier current, cable or day-time only radio stations, in part because of lack of available FM spectrum and the associated costs of broadcasting under current regulations. Low Power FM will be a way for these stations to expand their reach to students living off-campus, neighboring families, alumni and other interested neighbors. Other colleges and high schools can explore starting up new stations that target the local geographic community. College and high school radio already provides tremendous service to many communities; Low Power FM will both create new spectrum availability, lower the cost of building and managing a station and, hopefully, streamline the application and regulatory process so other students and communities can benefit.

Opportunities for Small Business:

Low Power FM stations will have large implications for small business. A significant small business sector -- independent record labels and musicians -- will have new opportunities to gain exposure on creatively-programmed stations operating on Low Power FM. Currently, if a recording does not fit into a centrally proscribed radio format, it is difficult to gain exposure via radio. Without exposure through radio, it is extremely difficult to sell enough compact discs or cassettes to build and support either an independent record label or a career as a musician. Low Power FM stations would create new opportunities for music that does not fit into existing formats.

New Model for Small Towns and Niche Markets:

The lower technical requirements and reduced start-up costs will make small town broadcasting much more viable. In many small towns, a Low Power FM signal of between 100 and 1000 watts could reach the entire population of a small town without the costs or technological headaches of building and managing a full-power signal. Similarly, in large metropolitan areas specific communities – both ethnic and generational – can be targeted in a low power scenario. In the current scheme, licenses are either unavailable or the cost of entry is simply too high; in the Low Power FM model, local and niche programming will become much more of a reality.

The Low Power FM Radio Coalition

Our Board of Advisors is made up of a cross-section of individuals who are interested potential broadcasters, and, in some instances, current users of the radio spectrum. We encourage the Commission to adopt a proposal for the establishment of Low Power FM radio, and will closely scrutinize any framework the Commission proposes in the coming months. We also will educate the public on the benefits and potential applications of Low Power FM radio, and provide forums for sharing ideas, effective existing models, and solutions to potential challenges Low Power FM broadcasters may face.

Incumbent broadcasters have expressed concerns about the impact of Low Power FM on their existing signals. These questions, however important, are for engineers to evaluate and therefore extraneous to our basic request. If Low Power FM is proven to critically disable incumbent broadcasters' signals, it should not be implemented. We believe, however, that engineering studies will demonstrate that Low Power FM is a viable mechanism to serve the multitude of voices calling for increased access to broadcast radio. We look forward to reviewing the Commission's initial framework and encourage you to move ahead on Low Power FM.

Sincerely,

Johnny Moreno
Program Director

CC: Commissioner Michael Powell
Commissioner Harold Furchtgott-Roth
Commissioner Susan Ness
Commissioner Gloria Tristani
Sen. John McCain
Sen. Conrad Burns
Rep. Tom Bliley
Rep. Billy Tauzin