



Haitian American Community  
Broadcasting Association, Inc.  
12393 N.E. 6th Avenue  
North Miami, Florida 33161

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C.20554

In the Matter of )  
)  
Creation of a Low ) MM Docket No. 99-25  
Power Radio Service ) RM Nos. 9208 & 9242

**REPLY OF THE  
HAITIAN AMERICAN COMMUNITY BROADCASTING ASSOCIATION INC.**

The Haitian American Community Broadcasting Association Inc. ("HACBA") hereby replies to the comments submitted regarding the above-referenced Notice of Proposed Rulemaking ("NPRM").

**DISCUSSION**

The NPRM originally was released on February 3, 1999. Now, after several extensions of the time in which to file comments, and more than nine months later, the formal pleading cycle is finally closing. Based on past precedent, it likely will be many more months before a final order in this proceeding is released. Only then will organizations such as HACBA be able to finalize their financing and operational plans to begin broadcasting.

In the meantime, many of America's newest citizens, and those whose interests are not well represented in the political process because they are members of "discrete and insular minorities,"<sup>1</sup> are being denied the opportunity to participate fully in our democratic system of government. For example, the Haitian community in South Florida includes many newly-naturalized citizens who are only marginally literate. Indeed, some studies suggest that as much as 85% of the Haitian-American community in Florida is functionally illiterate. As a result, the Haitian-American community relies heavily on the electronic media for its news and information. Unfortunately, that community largely is unserved by the existing broadcast stations in South Florida.

<sup>1</sup> United States v. Carolene Products, 304 U.S. 144, 152-53 n.4 (1938).

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HACBA's mission is to change that and the creation of a low-power radio service will help HACBA to do so. A single low-power station, in or around Dade County Florida where a large portion of the Haitian population resides, could provide an invaluable source of news, entertainment, weather, sports and emergency information targeted specifically to the Haitian community. As a result, many citizens, who currently have been disenfranchised by their isolation from the mainstream of American culture, may become informed and active citizens.

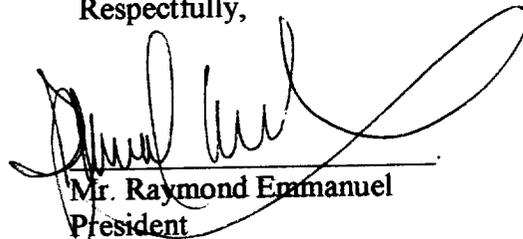
In addition, the establishment of a radio station dedicated to the needs of the Haitian community will provide an outlet for voices which currently have none. This is, in the highest sense, consistent with the very core of the First Amendment. In short, the establishment of a low-power radio service will provide Haitian-Americans a real opportunity to participate in the American experiment and to take part in the American dream.

The dream should no longer be deferred. The creation of a low-power radio service is perhaps the most important item on the FCC's agenda. It should command resources and attention commensurate with that status. Those that seek to derail this NPRM must not be allowed to prevail.

#### **CONCLUSION**

For the reasons set forth above, HACBA urges the Commission to proceed immediately with the creation of a low-power radio service.

Respectfully,

A handwritten signature in black ink, appearing to read 'Raymond Emmanuel', is written over a horizontal line. The signature is stylized and cursive.

Mr. Raymond Emmanuel  
President

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