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INTRODUCTION DOCKET FILE COPY ORIGINAL

These admittedly brief bits of information are hopefully presented to the Federal Communications Commission pursuant to the Commission's recent proposed regulations regarding low power educational FM radio.

It is the opinion of the author that the observations and recommendations herein are quite solidly based, from the standpoint of study and experience in the field of low power school broadcasting.

The author appreciates the opportunity to express his thoughts on this subject.

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Contrary to the Commission's pronouncements in the 1978 proceedings, the great majority of high schools in the United States do not function during the summer. The economics of the past twenty years have actually even caused a diminishing of summer school in many districts. School districts who have limited or eliminated busing, music, sports, new buildings and other so-called frills, have been in many cases most apt to throw out summer classes as a luxury they cannot afford. The National Education Association has attested to this condition frequently during the '80's and '90's. The all year requirements under the new proposal would certainly add greatly to the expense of the operation.

It is important to consider the problems of the various school sizes. Urban and suburban high schools mostly fall into the Class A (top rank) group, while outlying high schools lie in the B-C-D-E divisions (various states may classify differently).

In 1975 there were 100 Class D school stations—very few within urban areas. There were a fair number located in the suburbs in the country. The majority of Class D (1978) was in outlying areas—mostly in Indiana, Michigan, Illinois, and Ohio.

In the 1975 study, it seems apparent that these existing stations were not cut from the same mold.

It must be recognized that high schools in this country are dissimilar in many ways from each other: size (from 100 to 5,000 student body), finances (from adequate to desperate), territory (urban, suburban, farm land, industrial, prairies, hills, mountains, deserts, tourist areas, coastal lands, private, parochial, large consolidated districts). Summer school for the majority of these high schools is not feasible, nor possible. Summer is for farm work and tourist time. The last few seasons have been characterized by a lack of labor available to farms and tourist areas, the same way for industrial areas who depend on junior and senior high school students for summer employment, thus many students would be unavailable for any high school station operation. This situation would be evident in at least half of the school districts in the United States, especially with the added costs.

SHARING

Sharing ownership of school radio stations by two or more school districts does not appear feasible to this person. Most school stations throughout the country in 1978 were miles apart from each other, with the possible exception of some suburban areas (Detroit, San Francisco, Los Angeles). Sharing operation under those conditions sounds like a dream that could never come true due to the inevitable multi-management stew and the miles between.

A better system might possibly function in suburban areas where enough stations (2-4) might exist, in which a primary station holds the license and the others exist as remote program sources. This arrangement might find it much easier to expand programming hours and might also jointly operate summer program schedules. Such an arrangement might lengthen the operating and financial burden for all of them. It might even constitute a new kind of networking.

This proposal does not merit too high a score, but it does suggest a way that might suit certain school stations in certain areas.

BENEFITS

It seems appropriate to point to the school radio station as a rich and rewarding experience for high school students. Ignoring the fun and excitement, there are many other potential benefits:

1. Writing composition and mechanics (grammar, spelling, vocabulary)
2. Oral training (pronunciation, intonation, diction, phonetics)
3. Learning and applying technical and electronic skills
4. News gathering, writing, and editing
5. Learning about government, weather factors, sports, news events, remote broadcast practices
6. Learning about musicology (composers, performers, music categories, conductors, restrictions, broadcast music mechanics)
7. Learn by practice the art and mechanics of creating, directing, and producing various types of programming
8. Achieving confidence and expertise from dealing with real life work
9. Experiencing a practical, useful discipline

RATIONALE

In my 1975 sabbatical study of high school Class D radio stations, I visited seventy-five of the one hundred stations then in existence. (The remaining twenty-five I could not reach for various reasons: illness, location, schools closed for maintenance, weather, weekends, vacations, time).*

At every station I visited, I inquired whether any college/university people, or FCC, or perhaps status individuals (NAEB, educational stations, commercial broadcasters or any networks) had ever visited them. The answer was unanimous: “**none**”! Some of the students indicated that they had visited local commercial stations—in fact some of them were working part time at their local commercial outlets.

A sidelight here (and I saw it at work in the station which I managed): in many of the districts I visited, the local commercial stations had expressed appreciation for their ability to hire already trained operations, thus allowing to some degree the ongoing problem of losing good operators to higher power (and higher paying) radio stations.

Looking backward to 1978, it appears that the low power Class D rule was just about right. The option to choose their own hours of operation was a huge plus, since such an arrangement could be fitted into just about any kind of school environment; if the proposed regulation of 84 hour weeks and the all year requirements are instituted, up to three quarters of the school districts in the country would be denied the experience of high school radio in their communities—it would be beyond their financial resources, especially in these time of public education poverty.

* I did correspond with those stations I could not reach. I believe therefore, that the study was quite complete in its revealing the nature of high school radio across the nation. On the basis of their responses to my inquiries (and my own experiences) I feel I developed a reasonably sound perception of low power high school radio in this country.

RECOMMENDATIONS

Briefly, I would advise, and hope, that low power (10 watts or less) be reinstated in pretty much the same fashion as the original lower power high school radio stations—no weekly hour requirement, no all year demand. Any less than that would declare, in effect, that well over half the nation's high schools could not participate, in my judgment.

James L. Mead

AUTOBIOGRAPHICAL STATEMENT

- Name: James L. Mead
- Birth: November 16, 1915, Moddersville, Missaukee County, Michigan
- Education: Elementary schools: Clare, Gladwin, and Missaukee Counties; Harrison (Michigan) High School, 1933; AB Wayne State University, 1943; ME Wayne State University, 1957; EdD Wayne State University, 1965
- Positions: Teacher—Speech, English, Social Science, Harrison High School and Royal Oak Dondero High School (Michigan); Director of Radio Broadcasting, Royal Oak Schools and Central Michigan University
- Recognitions: Valedictorian, High School; Phi Delta Kappa, Wayne State University; Professor Emeritus, Central Michigan University
- Memberships: Michigan Education Association; National Educational Association; Royal Oak Education Association; Michigan Speech Association; Speech Association of America; American Association of University Professors; American Institute of Parliamentarians; American Broadcasting Society
- Offices: Chairman, Steering Committee Southeastern Michigan Association of College Agreement Schools; Chairman Curriculum Guide Committee of Radio-TV Interest Area, Michigan Speech Association
- Travel: All United States, Southern Canada, Europe
- Publications: Article—*Bulletin*, Michigan Association of School Librarians; *Action* (Metropolitan Detroit Bureau of Cooperative School Studies); *Bulletin*, Michigan Speech Association; *Journal*, National Association of Educational Broadcasters, *Resolution*, Proposed Certification for Speech Teachers in Michigan High Schools (Michigan Speech Association)