

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

In the Matter of	)	
	)	
Modernization of Media	)	MB Docket No. 17-105
Regulation Initiative	)	

**REPLY COMMENTS OF PROMETHEUS RADIO PROJECT**

Prometheus Radio Project (“Prometheus”) is a nonprofit organization that works to build and support a vibrant community radio landscape in the United States. We advocated for the original creation of the low-power FM (“LPFM”) service, have built and supported dozens of community radio stations, and organized nationally for passage of the Local Community Radio Act. In the 2013 LPFM application window, we directly supported over 1,000 local community organizations to apply for LPFM licenses. More recently, we have worked with hundreds of LPFM construction permit holders to get on the air and effectively serve their communities. Our central concerns as an organization are to support grassroots media and make technology and public policy accessible to local communities.

The Commission’s initiative to strengthen and streamline media regulations is a welcome opportunity to strengthen the LPFM service. Prometheus generally supports the comments in this docket of REC Networks<sup>1</sup> and Jeff Sibert<sup>2</sup> as they relate to broadcast regulations and changes to the LPFM service. Importantly, any proposed changes to broadcast regulations as part of this initiative must be evaluated for their impact on the LPFM service.

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<sup>1</sup> [comments.pdf](#), REC Networks, MB docket 17-105 received 6/26/17

<sup>2</sup> [17\\_105 comments on media regs.pdf](#), Jeff Sibert, MB docket 17-105 received 7/5/17

Proposals that would result in increased full-power FM station density in urban areas must also include protections for LPFM stations licensed in those areas. Because LPFM stations are not protected from full-power stations, they would suffer if new regulations result in higher station density and spectrum utilization. The 2011 LCRA eliminated third-adjacent protection requirements, enabling LPFMs to be allocated in many cities for the first time. The Commission must carefully consider rule changes that could increase FM congestion in those urban areas, disproportionately harming these young LPFM stations.

Proposals that would allow greater flexibility for FM translator allocations and modifications must include similar flexibility for LPFM stations. Although LPFM stations enjoy a co-equal status with FM translators by statute, experience of Commission rules tells a different story. The asymmetric allocations rules have resulted in LPFM stations being short-spaced by translators and sometimes completely boxed in by short spacings, making relocation difficult or impossible<sup>3</sup>. LPFM stations sometimes experience interference from translators because of the weaknesses of the contour-protection method for lower-power transmissions in certain terrain situations. We propose that the Commission update allocations rules to give LPFM stations similar flexibility to FM translators.

Several commenters in this docket explore issues we believe the Commission should consider. allowing applicants to file new LPFM permit applications at any time; an upgrade path for LPFM stations to class A; and providing station permittees a normal time-to-construct of 3 years, plus the option for a 2-year extension.

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<sup>3</sup> Petition for Reconsideration of Prometheus Radio Project, MB Dkt. No 13-249, filed Apr. 10, 2017, available at <https://ecfsapi.fcc.gov/file/104101216505007/17-04-10%20Prometheus%20Petition%20for%20Reconsideration%20of%20AMR%20Order%20AS%20FILED.pdf> ("Petition for Reconsideration").

We disagree with commenters' proposals concerning: reducing radio-station transparency and accountability to the public in part through curtailment or elimination of public files and ownership reports<sup>4</sup>; reducing rural listener protection by eliminating the rural radio rules and arguably the city-of-license concept and rules; and commercialization of non-commercial radio services.

Respectfully submitted,  
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Prometheus Radio Project

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<sup>4</sup> 17-08-04 reply comments of Prometheus Radio Dkt 17-105.pdf, Prometheus Radio Project et. al, MB docket 17-105 received 8/4/2017



