



Radio Miami International

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Office of the Secretary
Federal Communications Commission
Washington, DC 20554

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FCC MAIL BRANCH

In the Matter of

Notice of Inquiry
Preparation of International
Telecommunication Union World
Radiocommunication Conferences

ET Docket No. 93-198

Released June 28, 1993

Transmitted herewith are an original and four copies of comments from Radio Miami International, licensee of International Broadcast Station WRMI, in response to the referenced Notice of Inquiry.

Station WRMI is under construction at this time. However, Radio Miami International has for approximately the past four years worked as a program broker for other FCC-licensed International Broadcast Stations, such as WRNO, WHRI and WWCR. Personally, I have been involved in various aspects of private shortwave radio broadcasting in the United States and in several other countries since the late 1970's. I have worked as a consultant for the Voice of America, Radio Marti, the World Service of The Christian Science Monitor and several foreign shortwave broadcasting stations such as

position as the licensee of a small International Broadcast Station (with one 50,000-watt transmitter).

1. We very much believe that private shortwave broadcasting in the United States is in the national interest and should be protected and encouraged as part of our commitment to freedom of expression. The United States is one of the few countries in the world with privately-owned international radio services. In my research regarding foreign media, I have become very aware of the serious limitations on freedom of speech caused by government monopolies on the broadcast media in many countries. As an integral part of our commitment to free speech, privately-owned international broadcasting from the United States must be encouraged by our government, and the government must not interfere with program content.

2. We are very skeptical of plans to replace international shortwave broadcasting with satellite signals, and of plans for mandatory replacement of double sideband shortwave broadcasting with single sideband broadcasting. Experiments with single sideband broadcasting by several international broadcasters in Europe and Latin America in recent years have been abandoned due to lack of response, or to negative response. Worldwide, the percentage of shortwave radio receivers presently available with single sideband reception capability is extremely small, and the quality of such reception on the receivers which do have that capability is very poor in comparison with double sideband broadcasting. As Mr. Jacobs has pointed out in his comments, when you have 600 million receivers in use around the world that can pick up double sideband shortwave signals, but only a small percentage are capable of picking up single sideband signals, the world's broadcasters should not be expected to switch to single sideband anytime in the near future. This switch would require a coordinated effort on the part of manufacturers and broadcasters worldwide. I don't want to sound overly negative, but there is virtually no such cooperation going on in the world presently, and it will be extremely hard to initiate this type of cooperation in the near future. It's a good idea, but it's a very difficult thing to do, since you're dealing with largely government-owned broadcasters, largely privately-owned receiver manufacturers and a need for worldwide coordination between all of them.

As for direct satellite broadcasting replacing shortwave broadcasting, this is even further off in the future. My research in Latin America, for example, has shown that most people in the region are very lucky to have access to a cheap shortwave receiver, and it will be a very long time before a significant percentage will be able to afford satellite receiving equipment. The situation is much the same in Africa and Asia. Direct international satellite

audio broadcasting is decades away. And as Mr. Jacobs very rightly pointed out in his comments, shortwave broadcasting will still remain the only direct form of international broadcasting not subject to gatekeepers such as the owners of the satellites.

3. FCC frequency usage fees should very definitely be eliminated, for all of the reasons given by George Jacobs. Radio Miami International is one of the smallest FCC-licensed International Broadcast Stations, and we are paying approximately \$3,300 per year in order to register frequencies for one transmitter. This is a significant portion of a station's budget, not only for non-profit religious licensees, but also for commercial licensees such as Radio Miami International. It very definitely affects the number of hours a station will broadcast. Some of the other FCC-licensed International Broadcast Stations which are clients of ours have either reduced their hours of transmission or have passed on the frequency usage fees to clients who are buying time on their stations, making it more difficult for the clients to afford the airtime. These types of consequences are definitely not consistent with the objective of encouraging private shortwave broadcasting in the United States.

4. There is very definitely a shortwave frequency shortage for international broadcasters. Instances of two or three stations using the same frequency at the same time are commonplace. We cannot emphasize highly enough the need for the United States to continue pressing for more shortwave spectrum space for international broadcasters. Equally important, the United States should continue to encourage and permit the use by FCC-licensed International Broadcast Stations of additional frequencies allocated at WARC-79 and WARC-92 and lightly-used portions of other HF bands on a conditional non-interference basis.

All of the above is respectfully submitted in the spirit of promoting better cooperation between the government and the private sector in matters of U.S. international broadcasting.

Sincerely,



Jeff White
General Manager