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Federal Communications Commission
Office of the Secretary
Room 222
1919 M Street NW
Washington, DC 20554

Regarding RM-9208

Sirs:

I am responding to the petition filed July 7, 1997, RM-9208.

I do agree with many portions of this rulemaking proposal. There is a need in this country for minority access to the airwaves by individuals with a desire to broadcast and serve their communities in a way that present FCC rules do not allow. Current licensing procedures do not allow the airwaves on the FM band to be utilized by anyone requiring less than 100 watts to cover their desired target geographical areas. This problem, as Mr. William Kennard recognizes, has only worsened with the consolidation that has taken place as a result of the de-regulation of 1996.

While Mr. Leggett addresses some of these issues and presents ideas of how this service could be structured I fear that is does not address the real needs of a microradio or Low Power FM (LPFM) service.

I personally feel that a 1-watt maximum with a 50-ft. maximum height allowance is much lower than what is really needed. I suggest instead the consideration of a LPFM service along the lines of translator's stations. This service would allow a 250 watt maximum limitation with a much higher antenna height limitation, such as 150 feet above ground level, vertical polarization. A higher power limit and antenna height would allow the coverage of entire small cities or areas such as what current translator stations have the ability to do. Vertical polarization would better able people in their cars to pick the station up.

However, the programming would not be limited to a re-broadcast of a satellite station or audio feed. Instead local origination would be mandated to truly service the people of each community by catering to their specific needs.

Mr. Leggett has underestimated the costs of running such a station. There may be paid employees, utilities and equipment. These expenses would not amount to simply thousands of dollars but more than likely tens of thousands of dollars.

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A Micro or LPFM service would not be attractive to individuals to participate in if they could not re-coup their investments and make a return as well.

One of the needs in small communities is radio advertising as an option to newspapers. The larger stations advertising rates are simply too high for small community businesses to afford. Much of the current cost of advertising on the power house stations is due to their tremendous signal reach. However, a small local business such as a hair salon or doughnut shop can not afford the premium advertising rates charged by these stations. While targeting the listeners in their community, most of their money would be wasted based on the fact that they would be paying for advertising delivered to an audience some 50 miles away. The listeners at that distance would not dream of driving 50 miles to buy a doughnut or have their hair done. A Micro or LPFM service would greatly benefit these small businesses by much reduced advertising rates due to a reduced signal strength. These small business could selectively target their immediate community and desired potential patrons and realize much reduce advertising rates in the process.

There are specific formats, as Mr. Leggett stated, that mainstream media would not cover because they are ratings driven. Many of these formats will be carried by LPFM. It is not a secret that many of the unlicensed "Micro-broadcasters" have tremendous audiences when compared to the strength of their signal. I conclude this is a result of being tuned in to their audiences and giving them something they never had.

I personally feel that if the FCC would allow this new licensed "Micro" or LPFM service the majority of the unlicensed "Micro-broadcasters" would become licensed and regulated to guarantee their longevity not to mention their safety (L.D. Brewer). There are many in this country that just can not afford the hundreds of thousands of dollars it takes to play in the AM or FM broadcast game. Many are amateur radio operators or people with a broadcast dream that can never realize it with today's rules in place. Micro or LPFM would be a good answer for these would be entrepreneurs whom want to broadcast

It would be impossible to allocate only 1 frequency on the FM or AM band for this type of service as Mr. Leggett has suggested. This same frequency will not be available in each given market. The better answer would be to look at each market individually and determine the best frequencies to use. I know that there are many frequencies on the spectrum where a full powered Class A would not fit. However a Micro operator could use it and interference would be very minimal if at all.

I do not agree that a single person or organization should be able to own up to 5 stations. A better answer would be to limit it to 1 station per owner. The potential owner would have to live within a 50-mile radius of the station and have been at his address for at least 1 year. He should not be able to sell the station

for a period of at least 3 years. This would discourage the Jacors' and ARS' from participating in LPFM. The chance of failure would be much greater if the operator was allowed to own and operate more than 1 station. This based on the fact that the income potential would be low on each station. The stations could not afford to pay a staff to run each station and the owner could not spread himself thin enough to run all 5 by himself. The failure rate I am afraid would be quite high. We want to insure that these important LPFM services can remain for a long time.

Technology and the times have changed. I encourage the FCC to take a serious look at Micro or LPFM radio services and consider putting rules in place to allow them to exist.

Sincerely,

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