

**Arlene C. Kirsch & Hugh L. Guilderson**  
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Office of the Secretary  
Federal Communications Commission  
Room 222  
1919 M Street NW, Washington, DC 20554

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July 22, 1998

**Before the Federal Communications Commission**  
**Washington DC 20554**

**In the Matter of Proposal for Creation of Low Power FM (LPFM)**  
**Broadcast Service FCC RM-9242**

To: Federal Communications Commission

Reply-Comments of Arlene C. Kirsch

We respectfully ask the FCC to drop all charges and investigations or grant amnesty to all current unlicensed community broadcasters out of respect for their important, vital, first amendment free speech activities. It is our strong belief that: (1) one watt is not enough for community radio; (2) radio station owners should be required to live within 25 miles of the new stations, and that there should be only one station per owner in order to maximize a diverse and free-wheeling use of the airways rather than stifle speech and culture; (3) LPFM (low power) stations should be allowed for-profit status; and (4) LPFM should be required to provide local content.

Thank you.

Signed:

   
Arlene C. Kirsch and Hugh L. Guilderson

P.O Box 721  
Wellfleet, MA 02667-0721

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DATE

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**CERTIFICATE OF SERVICE**

We, Arlene C. Kirsch and Hugh L. Guilderson, do hereby certify that a true and correct copy of the foregoing "Reply- Comment on RM-9242" was sent via first class mail this 22 of July, 1998 to the following parties:

Harry L. Baumann  
Executive Vice President & General Counsel  
National Association of Broadcasters,  
1771 N Street NW  
Washington DC 20036

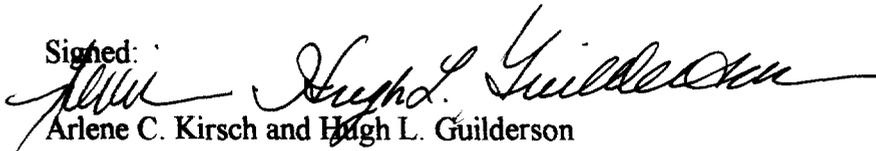
Counsel for State Broadcasters Association  
Richard R. Zaragoza, David D. Oxenford  
Fisher Wayland Cooper Leader & Zaragoza L.L.P.  
2001 Pennsylvania Ave. NW, Suite 400  
Washington DC 20006-1851

Counsel for USA Digital Radio L.P.  
Robert Mazer, Albert Shuldiner  
Vinson & Elkins L.L.P.  
1455 Pennsylvania Ave. NW  
Washington DC 20004-1008

American Community AM Broadcasters, Inc. (ACAMBA)  
Bryan Smeathers, President  
PO Box 973  
Central City, KY 42330

RM-9242 Petitioner  
J.Rodger Skinner Jr.  
President TRA Communications Consultants Inc.  
6431 NW 65th Terrace  
Pompano Beach, FL 33067

Signed:

  
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