

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC

In the matter of:)
LPFM Licensees Propose Necessary) RM-_____
Improvements to the Low Power FM)
(LPFM) Radio Service) MB Docket _____
)

PETITION FOR RULEMAKING
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PETITION FOR RULEMAKING

INTRODUCTION

The Low Power FM Advocacy Group (LPFM-AG) is LPFM's only exclusive advocacy group and is committed to protect the interests of both LPFM operators and LPFM audiences. LPFM-AG is proud of the 50+ licensed LPFM stations who are participating by taking the time to submit individual station case studies for this petition. Read their submissions later in this petition. (Appendix A)

<http://LPFM.Audio>, LPFM's largest and most influential audio distribution hub is also thankful to its 100+ licensed LPFM station members and those who participated in the creation of this petition. (Appendix B)

BACKGROUND

There was a time in American radio history when tiny towns had FM dials that featured live 24-hour air staffs.

It was a time when small businesses could afford to buy all the advertising they needed on their local FM radio stations. Even lightly populated areas had emergency weather service broadcasts on their radio dials. Local people could actually hear the name of their own towns on their radios. Somehow, with all of those expenses, most radio station owners seemed to be making good money. Back then, there was never a shortage of willing companies who wanted to own radio stations.

That was a long time ago; prior to April 1992, when the FCC allowed FM station operators to control a second FM station in each market. It was something called duopoly and that is precisely where the need to create LPFM started. Duopoly was the beginning of the end for traditional small town American radio.

As such, wise people had foresight. Low Power FM radio had a real purpose in the early stages. LPFM was originally meant to be a fully commercial service in order to replace all of the stations lost to the duopoly & telecommunications rule changes of 1996; not the watered down version of NCE-FM that it has become. However, as there were no advocates beyond a small, unorganized group of spirited activists pitted against a huge corps of legal teams for NAB and NPR, LPFM was understandably destined to fail. Naturally, without licensees of LPFMs to fight for the service in the early days, it has become a victim of rules created by its competitors. Now those rules are killing the LPFM service. Nearly 600 stations have perished in just 15 years. (Appendix C)

As you read on, you will see it is becoming a public safety problem.

Fact: The LPFM rules need to be fixed fast to protect the service from destruction.

LPFM competitors like NPR and the NAB do not have LPFM's best interest in mind. LPFM is made up of small FCC licensed FM radio stations. Full power stations view us as potential competitors, which threatens our existence. This gives us a vested interest to get involved due to the fact that Full Power FM and its lobbyists do not reflect our interests and therefore, we submit that many of the LPFM rules were written to forego future potential competitive issues from LPFM toward commercial FM and NCE-FM. This is our primary purpose even more so than as an aid toward furthering LPFMs unique local ability to serve its audience. A large amount of the rules actually prevent LPFMs' ability to adequately serve the public interest. Some rules even hinder LPFM stations from protecting their audiences during emergencies, in favor of guarding profits for full power radio interests.

Hardly anyone listens to AM radio anymore and even the FCC admits that AM has public service effectiveness problems so severe they merit band

revitalization. Yet, if almost 600 AM stations went silent in just fifteen years, alarm bells would certainly sound. This has already happened for LPFM across the nation, but little has been done. *Yet, for LPFM, no one seems to say a word.* LPFM-AG would like to be the first in the submission of this petition.

When the FCC rules for LPFM were created in 2000, there were no “LPFM licensees” to consult with. It was easy to make mistakes, since no “real world” LPFM experience could be behind the rules that were being created. Operational rules that were actually *bad* for the service were solidified. Now that many years have passed and much experience has been gained, policy makers have the rare opportunity to make things right.

Today, America has fifteen years of operational LPFM experience. FCC regulated operational areas warranting improvement are now glaringly obvious. The FCC can now create rules for LPFM that work for everyone; most importantly, American citizens who live in rural and lightly populated areas.

LPFM has become a more lucid service over the last 15 years. We now know what works and what doesn’t work. Add decades of US radio history and the many lessons learned over time from the standard commercial FM and NCE-FM radio services, and we have the clearest eye ever on the best practices for American LPFM radio. Some practices work and some ideals, like noncommercial LPFM in 2015, can’t possibly ever work or be in the public interest.

1- Noncommercial LPFM cannot work in nearly all cases: (*Appendix A*) NCE-FM (*NPR/PBS*) and other non-commercial broadcast services make pleas for funding each year in Washington from the taxpayer funded *Center For Public Broadcasting.* (*Appendix E*) This easily proves that the noncommercial business model doesn’t work for full power radio stations either... and they have power levels a thousand times more powerful than

LPFM stations! With such low power levels, it makes no sense to make LPFM noncommercial.

2- LPFM is unfairly and excessively fined when it misunderstands a rule. When a large market NCE-FM breaks an FCC rule, it could cost them the equivalent of a day or two in billing. The same fine applied to an LPFM could equal a year's income. This punishment is disproportionately affects LPFM and further widens the gap between high power and low power FM. NCE-FMs can typically afford these fines, but they are business enders for tiny LPFM stations. Surely, this is not only inequitable, but also unjust.

3- LPFM is more influenced by commercial businesses as a noncommercial service, than it would be as a commercial service. Tiny LPFM power levels make the station's "pool" of potential underwriters so small that commercial businesses actually have *more* potential control over an LPFM's programming as an NCE-LPFM than as a fully commercial LPFM. NCE-FM rules actually allow LPFM *more* corporate control over LPFM programming, not less.

Further, as a strictly noncommercial service, LPFM forces its audiences to put themselves at unnecessary risk to emergency events, weather disasters, and other important public safety occurrences. Listeners to other commercial band FM radio (92.1-107.9 MHz) stations have come to *expect* these important services from their stations. LPFM cannot broadcast commercials, even barter messages, for purposes of acquiring emergency, life-saving programming. As such, LPFM stations don't broadcast these important public services. News, weather, traffic, educational, public safety, and other basic public protection programming are denied to the audiences of LPFM stations due to rules that don't even serve their own noncommercial purpose.

LPFM is a service that is supposed to have a governmental "educational" mandate. The "E" in NCE. One obvious focus of many stations is in the

training of young radio talent. How can educators train students in topics like radio commercials, jingles, radio-based marketing, and general advertisement, if these activities are against the rules? Learning and teaching the skills to run a radio station are hands-on activities and are cultivated by doing them and then measuring the results. These valuable learning activities are barred under current restrictions. What sense does it make to train young talent on ways to only do noncommercial radio; when most radio careers are built on positions in commercial radio? NCE-FM rules actually inhibit the educational mandate that is codified by law and unfairly applied to LPFM.

Finally, many of the best cultural, educational, and historic programming is produced by providers who demand that its affiliate stations broadcast commercials in exchange for the programming. Noncommercial LPFM, of course, is noncommercial and, as such, denied most of the best educational programming.

4- There is no financial incentive for the board of an LPFM to provide “above basic” public service, improved educational or other public interest programming on an LPFM. This denies the audience of an LPFM the best public service from their local stations and exists for many reasons.

a. LPFM is a secondary service. That means that, after investing thousands of dollars to build, develop or improve an LPFM, any full-power station on the dial can easily move their dial position and snuff an LPFM out. This denies LPFM equal protection under the law for their monetary investments and constitutes a capital loss for the LPFM while the high power FM station is allowed to operate freely and without any restitution to the LPFM for displacing them.

b. LPFM stations cannot be sold for a profit, therefore there is no incentive to improve the station and spend the money it takes to serve the audience. Any capital investment in the LPFM is eventually lost since the

station can not recuperate the loss through advertising revenue. Stations are worth more financially when they have gained public service value; yet LPFM audiences cannot benefit from this. LPFMs are denied the ability to contribute to the community by supporting the local business community since there is not monetary incentive to do so, because they cannot earn money from advertising and marketing sales. As such, most stations only meet the bare minimum levels of programming responsibility. This in no way contributes to the overall public good as is the FCC mandate for broadcasters of all types.

5- LPFM already is not a Commercial FM or a NCE-FM service.

1- Both services have *much more* liberal ownership rules. For instance, unlike either service, LPFM licensees are only allowed one station.

2- Stations in both services can realize cost savings of being broadcast to and owned by distant, faraway broadcasters who, often, do not broadcast any local information. *LPFM must be licensed to and operated by local groups.*

We believe that it is time that the valuable contributions and experience of local LPFMs are allowed to contribute in greater ways and in ways that allows us to be viable rather than dying out. After fifteen years, our experiences are more than just recollections, they are now solid research data. After nearly 600 LPFMs have died out; and, with the recent window of hundreds of new stations that are just getting started, the proposed changes in this petition should be considered as an emergency request for changes to save the fast failing LPFM service. Each rule change is necessary to preserve this important local service against the current and inequitable competitive economic landscape and must integrate a sharper operational view toward LPFM's actual and future survival.

LPFM IS NOT “MINI-NCE-FM”

When LPFM was first conceived, the petitioners saw it as a fully commercial, local FM radio service. There was a real public need for such a service, to reserve those areas where FM stations had been stripped away and had transferred to clusters in larger nearby markets.

It was not created to be the “mini-NCE-FM” service it has become and there was never a need for that type of service.

The NCE-FM service was already fully capable of licensing a 100 watt FM station.

LPFM certainly was not created nor ever meant to be a noncommercial service. It *had* to become noncommercial to survive scrutiny by both NCE-FM and commercial radio advocates. In the end, LPFM had to be “built to fail” to satisfy interests on both the commercial radio and NCE_FM sides. If commercials, primary status & translator technical rules were included, LPFM would never have made it. It would probably still be in the courts today.

15 years after this important public service was born, it is time to remove the fetters that prevent LPFM from being successful and start serving those it was designed to serve, the American people. LPFM was created to edify small town USA and was going to do amazing things by improving local economies, offering affordable local FM advertising, and building community pride. LPFM was going to fill a vacancy in American public service that was big enough to warrant its creation. Yet, still today, due to the anti-competitive lobbying efforts of powerfully and richly supported full power radio operators, LPFM still cannot serve its original purpose. Small town USA is still largely ignored by their FM dial. This is not what the original creators intended; they had noble reasons for getting LPFM started.

CURRENT LPFM RULES PLACE AUDIENCES AT RISK

LPFM radio stations are often located on the commercial band; an area of the FM band where the US public is used to receiving important public information like emergency alert information, weather warnings, breaking local news, and important emergency traffic reports.

However, since an LPFM usually cannot afford to *pay cash* for these services, they are typically not provided. Commercial stations, however, can barter these services for advertising time and, as such, do not have to initiate budget lines to pay for them. Their audiences have learned to rely on these better equipped stations; creating a false sense of security within the entire commercial band itself.

Real World Numbers: Costs that LPFMs face vs. Commercial FM...if they wish to serve their communities with public safety emergency information:

PUBLIC SERVICE	COMMERCIAL RADIO'S COST	LPFM'S COST
Local Weather Forecasts from a Meteorologist - 24/7 coverage map reports and emergency reports during dangerous local conditions.	Barter - Free to the station if they broadcast commercials. Broadcast a daily schedule of commercials provided by the Report Provider in exchange for a whole day's reports. No cash is ever needed - which usually saves radio stations thousands of dollars.	\$50 week/\$200 month/\$2,400 year
Local Traffic Reports during Drive Times and during emergencies - both airborne and car based	Barter - Free to the station if they broadcast commercials.	\$25 week/\$100 month/\$1,200 year
Local News Reports - with important breaking news	Barter - Free to the station if they broadcast commercials.	\$50 week/\$200 month/\$2,400 year

PUBLIC SERVICE	COMMERCIAL RADIO'S COST	LPFM'S COST
Educational Syndicated Radio Programming like "American Top 40 with Casey Kasem," flash-back style programming, teaching shows, etc	Barter - Free to the station if they broadcast commercials.	\$250 week/\$1000 month/\$12,000 year
High Quality Radio Programming Elements for imaging, holiday themed production and programming, jingles, IDs, voiceovers & other basic station elements	Barter - Free to the station if they broadcast commercials. Broadcast a daily schedule of commercials provided by the Report Provider in exchange for a whole day's reports. No cash is ever needed - which usually saves radio stations thousands of dollars.	\$75 week/\$300 month/\$3,600 year
<i>Total Cash Paid by Station Each Year</i>	<i>\$0</i>	<i>\$21,600</i>

PLAYING COMMERCIALS vs A COMMERCIAL SERVICE

Under FCC rules, the ability to broadcast “commercials” is only part of what makes the commercial FM service unique. There are other rules for commercial FM stations as well that prove that LPFM is nowhere close to the commercial FM service as currently defined by the FCC; even if full commercials were added to LPFM.

The definition of noncommercial and commercial is something that the FCC has determined and it is also something that the FCC has the power to review & modify in favor of LPFMs, if it so chooses. Many feel the FCC should adjust its interpretation of the LCRA and improve its definitions to provide a greater and more equitable public service to the American people via the LPFM service. They typically state that the NCE-FM rules were written for the mid-80s economic landscape and could never be the sole source of support for any station, large or small, today. Those rules imposed upon today’s LPFMs limit their viability and threaten their future existence. They are outmoded and do not reflect the needs of the overall public good as we progress deeper into the new millennium.

Creating a form of Enhanced Underwriting that supports LPFM would be the obvious solution. This form of “LPFM only” underwriting would enable the service to barter for programming that, not only helps the service reach its educational focus, but may save lives in the community. LPFM would be empowered to provide the services its community needs and asks for.

Underwriting of this sort could both enable local financial support for the LPFM and finally create an ability to work with large program producers to barter for their programming/emergency services. LPFM could finally be a sustainable public service.

If all radio stations, big and small, must broadcast in the public interest, shouldn’t public safety come first for every licensee?

Still as enhanced as underwriting of this sort would be, it still will not enable LPFM service to become part of the FCC's Commercial FM service. There are still many commercial FM benefits that LPFM would not enjoy; thus excluding it from the service.

The following Commercial FM rules would still not be a part of the LPFM ruleset.

Commercial Rules LPFM Has No Access To:

- 1- Cluster-style multiple station local ownership.
- 2- The ability to upgrade LPFMs to class A or higher.
- 3- Long distance ownership; LPFM stations must be owned by local entities as an exclusive FCC rule.

LPFM cannot be a commercial service at the FCC, even if it airs commercials. LPFM licensees do not enjoy all of the *other* benefits of being in a commercial service.

With this petition, LPFM-AG and its supporters are asking for *fair access* to public safety programming, educational & top quality historical commercial programming; LPFM further seeks changes to the rules that would allow community financial support; as much as can be developed with underpowered 100 watt transmitters.

As a matter of the current FCC rule, LPFM stations are banned from serving an important *public safety interest*, the ability to properly give advance notice of all emergencies to our local audiences through the use of commercially available emergency radio tools. Thus, LPFM audiences are less informed than all other services as well as the fact that LPFMs are

unable to perform one of their basic functions; serving the American listening audience *as a whole*, instead duplicating the usually very narrowly focused programming demographic targets of the already existing NCE-FM service.

There are currently *no tools available for a barter exchange for underwriting* from any known vendor anywhere for the access of these emergency elements. Instead, LPFM stations, with very little money, are forced to pay cash for these services, if they want to provide them to their audiences.

It is like an added tax for being an LPFM that wants to serve its audience. However, if an LPFM decides to leave the audience unserved, the tax is waived.

LPFMs Pays Cash For The Following Services; “Commercial Trades Them Out”

-Emergency and standard local weather services from meteorological staffs.

-Emergency and standard traffic reports for local towns.

-A huge amount of educational and historical syndicated programming.

-Local and national news, information, and sports services.

-Important imaging tools; even “news music” and “weather music” beds.

-Local sports events for colleges and high school sports.

LPFM Audiences: Under-Protected

American radio audiences expect all commercial band FM stations to protect

them equally, with access to the same cadre of emergency resources. If a gas pipe breaks downtown, they expect to get the same or higher level of service from their local LPFM that they might get from a faraway commercial FM station. To them, both stations are equal- however, one of them, the LPFM, is local.

The local LPFM would certainly be local listeners' best choice in an emergency if it could provide emergency services. The distant FM is a weak first choice at best. The lack of access to emergency broadcast information for LPFMs presents a public safety concern. This is very alarming and we hope to warn of this threat to public health with this filing.

We feel public safety foresight should have played a bigger consideration before the current LPFM rules were drafted. Listeners have been trained to expect that “commercial band” FM radio is responsive and will bring them breaking news & emergency information. However, unless it is an EAS warning from a faraway station, they will not get that sort of coverage from their local LPFM.

LPFM must be able to protect its audience:

We propose that enhancing underwriting to levels that enable audience protection will not make LPFM a “commercial service.” Instead, LPFM would be allowed to broadcast commercials as an important public safety need and a small means toward financially saving the LPFM service. Doing so would enable LPFM stations to become real assets to their coverage areas.

When a local emergency occurs, LPFM radio stations should be saving lives, not airing artistic, commercial-free programming. LPFM just wants to serve, support, and protect their communities.

From: MM Docket No. 99-25 (69)

Released: February 3, 1999

The FCC Acknowledges the Need for Commercial LPFM:

“...Some LP100 stations might sell some form of advertising to subsidize their operation and could possibly provide a useful advertising alternative for certain types of neighborhood businesses that cannot utilize full-power radio stations due to their expense and their broader geographic targeting...”

The words further acknowledge that the FCC also noticed that NCE-FM might have noncommercial radio programming covered & that LPFM might be given consideration as a commercial service:

“...We seek comment on whether programming on these stations should be strictly noncommercial and whether our current eligibility rules are appropriate, which permit educational and nonprofit community organizations to become licensees. However, should we not impose such a broad limitation, we note the possibility that part of the FM band will remain reserved for noncommercial LPFM operators, as discussed above at paragraph 19. This would ensure that a significant portion of low power radio facilities would be noncommercial in nature.”

NEW ADVERTISING MEDIA SINCE 2000

LPFM rules regarding commercials are so antiquated that, even in 2000, when they were created, they were a bad deal for LPFM. The proof is in the numbers. Hundreds of LPFM stations have sent their licenses/CPs back to the FCC as failing projects... in just 15 years.

Today, the underwriting & advertising support landscape for LPFM is much busier. LPFM has new competition coming from *everywhere*.

Blogs

Podcasts

Internet Radio Stations

HD Channel rebroadcasting on FM translators

AM Station rebroadcasting on FM translators

Websites

Online Forums/Meetups

New Digital TV channels

Satellite Radio

Pandora Services

Spotify Services

All who can serve our potential clients with:

-Calls to actions

-Comparisons

-NCE-FM rulebreakers

Commercials

Advertising

In this economy, where everyone is watching every dime, local businesses often feel that LPFM denies them the best value for their investment. It is

hard enough for them to get a return on investment with a commercial FM investment; much less a noncommercial one. From a small town, small business perspective, spending your limited advertising budget on ineffective NCE-FM underwriting, especially if its on an under-powered LPFM, is often a really bad idea.

In a challenged economic market where the client has to watch every cent, they are not likely prone to throw around money on bad investments. Due to the current FCC rules, LPFM underwriting continues to be a bad investment, in a bad economy, for small, struggling American businesses. This is bad news for LPFM and those who listen to these important stations. The FCC rules interpreting the LCRA that regard commercial content on LPFM stations are unnecessarily dangerous to the health and safety of American radio listeners, and are capricious and arbitrary at best. They do not make sense for the American radio listener, nor to community business owners. They are bad for public safety and do nothing for local economies when they easily can make a real difference. It is irresponsible not to give these rules a thorough review and change plan for improvement. It is a matter important enough to precede all others. LPFM can and should be allowed to contribute to the national economic landscape; building a better America one very small coverage area at a time.

SMALL BUSINESSES SHUT OUT OF FM RADIO OWNERSHIP

When big FMs left small town USA in the 1990s, they not only deprived these populations of their local FM radio service; they also inadvertently removed the classification of “small business” from the list of *eligible* American new FM radio station owners; unless the station in question is very, very undesirable. However, the original proposals at the beginning of the LPFM service were written to include commercial programming via small business ownership.

It is time that LPFM’s original intent is realized. LPFM needs to become the service it was truly designed to be; small town local FM radio. It must not continue as the lame, mini-NCE-FM service it has become and struggles to survive as. An NCE-FM with *less power* was not something anyone ever thought America needed. Indeed, LPFM was not created for this purpose.

It is un-American to exclude small businesses from ownership in FM radio stations. Auctions involving millions of dollars exclude them; LPFM rules exclude them. We believe that there should never be a time where foreign ownership restrictions, even 1%-5%, are waived while an FCC licensing system exists that excludes US small businesses as the current FM and LPFM radio rules do. Yet, this time **does** exist and it is current. With this petition, we hope the FCC will choose to remedy this inequality and injustice. If it is bad for American small business, it is bad for America. LPFM must be able to include and support small US businesses. Large FMs do not, small AMs cannot. Not one large market FM is moving back to their original city of license anytime soon. No one listens to AM. It is an inefficient use of valuable public spectrum not to let LPFM stations serve those forgotten American people. Not doing so should take better reasoning than the desire to provide noncommercial radio on a low powered FM station. Public safety is involved and should merit more consideration than the current LPFM rules seem to imply.

Current 73.853 Rule Text:

(a) An LPFM station may be licensed only to:

(1) Nonprofit educational organizations and upon a showing that the proposed station will be used for the advancement of an educational program; and

(2) State and local governments and non-government entities that will provide non-commercial public safety radio services.

(3) Tribal Applicants, as defined in paragraph (c) of this section that will provide non-commercial radio services.

(b) Only local applicants will be permitted to submit applications. For the purposes of this paragraph, an applicant will be deemed local if it can certify that:

(b) Only local organizations will be permitted to submit applications and to hold authorizations in the LPFM service. For the purposes of this paragraph, an organization will be deemed local if it can certify, at the time of application, that it meets the criteria listed below and if it continues to satisfy the criteria at all times thereafter.

(1) The applicant, its local chapter or branch is physically headquartered or has a campus within 16.1 km (10 miles) of the proposed site for the transmitting antenna for applicants in the top 50 urban markets, and 32.1 km (20 miles) for applicants outside of the top 50 urban markets;

(2) It has 75% of its board members residing within 16.1 km (10 miles) of the proposed site for the transmitting antenna for applicants in the top 50 urban markets, and 32.1 km (20 miles) for applicants outside of the top 50 urban markets; or

(3) In the case of any applicant proposing a public safety radio service, the applicant has jurisdiction within the service area of the proposed LPFM station.

(4) In the case of a Tribal Applicant, as defined in paragraph (c) of this section, the Tribal Applicant's Tribal lands, as that term is defined in Section 73.7000 of this Part, are within the service area of the proposed LPFM station.

(c) A Tribal Applicant is a Tribe or an entity that is 51 percent or more owned or controlled by a Tribe or Tribes. For these purposes, Tribe is defined as set forth in Section 73.7000 of this Part.

Proposed 73.853 Rule Text:

(a) An LPFM station may be licensed only to:

(1) Nonprofit educational organizations and upon a showing that the proposed station will be used for the advancement of an educational program; and

(2) State and local governments and non-government entities that will provide non-commercial public safety radio services.

(3) Tribal Applicants, as defined in paragraph (c) of this section that will provide non-commercial radio services.

(4) Small Businesses, as defined in paragraph (d) of this section that will provide LPFM rules based services that will not be the commercial FM service by FCC definition, but may broadcast full commercials.

(b) Only local applicants will be permitted to submit applications. For the purposes of this paragraph, an applicant will be deemed local if it can certify that:

(b) Only local organizations will be permitted to submit applications and to hold authorizations in the LPFM service. For the purposes of this paragraph, an organization will be deemed local if it can certify, at the time of application, that it meets the criteria listed below and if it continues to satisfy the criteria at all times thereafter.

(1) The applicant, its local chapter or branch is physically headquartered or has a campus within 16.1 km (10 miles) of the proposed site for the transmitting antenna for applicants in the top 50 urban markets, and 32.1 km (20 miles) for applicants outside of the top 50 urban markets;

(2) It has 75% of its board members residing within 16.1 km (10 miles) of the proposed site for the transmitting antenna for applicants in the top 50 urban markets, and 32.1 km (20 miles) for applicants outside of the top 50 urban markets;

or

(3) In the case of any applicant proposing a public safety radio service, the applicant has jurisdiction within the service area of the proposed LPFM station.

(4) In the case of a Tribal Applicant, as defined in paragraph (c) of this section, the Tribal Applicant's Tribal lands, as that term is defined in Section 73.7000 of this Part, are within the service area of the proposed LPFM station.

(c) A Tribal Applicant is a Tribe or an entity that is 51 percent or more owned or controlled by a Tribe or Tribes. For these purposes, Tribe is defined as set forth in Section 73.7000 of this Part.

(d) Small business is defined as an individual or any other group who can prove it has yearly earnings of under \$1,000,000. Bank statements, tax records, or personal affidavits are sufficient for this purpose.

FEES FOR AUCTIONS

Will these changes enable LPFM to become part of the “commercial FM” service without the added cost of auctions that commercial FM stations have had to endure? No. LPFM has had to pay its way as well.

LPFM licensees have had to endure their own unique financial obligations. These have been government mandated additional costs for only LPFM that are equal, if not greater, than the scaled costs commercial stations have faced with auctions.

For the sake of argument, say the added auction cost to a commercial class C FM station in a particular market is \$1,000,000.

ITEM	CLASS C FM	LPFM	DESCRIPTION
AUCTION	\$1,000,000	\$0 <i>(\$1,000 scaled proposed)</i>	<u>Scaled Proposed</u> 1- 100,000 watts/100 watts = 1,000 2- \$1,000,000/1,000 = \$1,000
TRANSMITTER CERTIFICATION	\$0	\$2,750+	Based on a typical 300 watt exciter (\$750 and up) versus the cost of an LPFM certified exciter (\$3,500 and up)
SECONDARY STATUS COSTS	\$0	\$10,000+	based on one (1) transmitter site move - many stations have made more than one move

When scaled properly against both commercial and NCE-FM payments vs transmitter power, LPFM has *more than* paid its way. All auction fees should be considered paid. As HD2/translator stations have become newly licensed *de facto* 250 watt commercial FMs; without any burden of auctions, LPFM, *the FCC's most local service*, should be afforded the same consideration.

The FCC can & should make these changes:

1- It was in the FCC's jurisdiction to create "enhanced underwriting" for NCE-FM

2- It was in the FCC's jurisdictions to create new fully commercial radio stations by enabling 250 watt translators to now originate programming by "rebroadcasting" stations that, due to inadequate market penetration, very few can hear; HD secondary sub-channels.

The FM translator rules say that only 30 seconds of local origination can occur on a translator. However, no auction was needed as up to a dozen new local 250 watt fully commercial FMs radio stations entered each US market - owned by the biggest & most wealthy corporate radio groups with the biggest existing station clusters - all via the FM translator service. Still LPFM after LPFM failed, year after year, as America's most local, and most poorly regulated, secondary small town radio service; a victim only to a lack of financial resources and the inability to ever gain such.

There would be no reason not to enable LPFM operators the same ability to survive by adding commercials to the airwaves and every reason to do so. There is no desire to make LPFM a commercial service. Underwriting rules simply need to be enhanced to a level that allows LPFM stations the ability to protect their audiences, a matter of public safety and the FCC's primary congressional mandate; outweighing even the LCRA.

That being said, this petition seeks immediate relief from the rules and financial climate that has destroyed nearly 600 LPFM radio stations (*Appendix B*) by proposing the following rule changes to the text regarding auctions:

Current 73.5000 Rule Text:

§ 73.5000 Services subject to competitive bidding.

(a) Mutually exclusive applications for new facilities and for major changes to existing facilities in the following broadcast services are subject to competitive bidding: AM; FM; FM translator; analog television; low power television; television translator; and Class A television. Mutually exclusive applications for minor modifications of Class A television and television broadcast are also subject to competitive bidding. The general competitive bidding procedures set forth in part 1, subpart Q of this chapter will apply unless otherwise provided in part 73 or part 74 of this chapter.

(b) Mutually exclusive applications for broadcast channels in the reserved portion of the FM band (Channels 200– 220) and for television broadcast channels reserved for noncommercial educational use are not subject to competitive bidding procedures. Applications for noncommercial educational broadcast stations, as described in 47 U.S.C. 397(6), on non-reserved channels also are not subject to competitive bidding procedures.

Proposed 73.5000 Rule Text:

§ 73.5000 Services subject to competitive bidding.

(a) Mutually exclusive applications for new facilities and for major changes to existing facilities in the following broadcast services are subject to competitive bidding: AM; FM; FM translator; analog television; low power television; television translator; and Class A television. Mutually exclusive applications for minor modifications of Class A television and television broadcast are also subject to competitive bidding. The general competitive bidding procedures set forth in part 1, subpart Q of this chapter will apply unless otherwise provided in part 73 or part 74 of this chapter.

(b) Mutually exclusive applications for broadcast channels in the reserved portion of the FM band (Channels 200– 220), for all low power FM radio channels and for television broadcast channels reserved for noncommercial educational use are not subject to competitive bidding procedures. Applications for noncommercial educational broadcast stations, as described in 47 U.S.C. 397(6), and all low power FM radio stations on all channels also are not subject to competitive bidding procedures.

LPFM COMMERCIAL INFLUENCE

The Commission's definition of underwriting for LPFM can be said to be very restrictive and hard to understand. (*Appendix F*) It is a descriptor so bad that it almost ensures that the service will not be able to survive. LPFM rules put lives at risk, stamp goodwill nonprofits out of existence, and allow two important US radio services (AM & LPFM) to die.

There are two types of basic on-air fundraising activities for an FM station on the air:

1- Enhanced Underwriting - Restrictive in the eyes of potential advertisers, especially in this economy, and not preferred by those who buy airtime to support radio stations.

2- Full Commercial FM - The norm. This is how everyone advertises. They expect the effective advertising service, especially 'call to action' and comparative statements, that Enhanced Underwriting will not deliver.

Everyone knows what a radio commercial is. At this point, it is helpful to understand where the problem lies, the rules LPFM stations have to follow, "Enhanced Underwriting."

Why Did the FCC Enhance Underwriting?

From a 1992 reprint excerpted from an FCC Public Notice, April 11, 1986 (FCC 86-161), which was published at 51 FR 21800, June 16, 1986

“In March 1984, we relaxed our noncommercial policy to allow public broadcasters to expand or "enhance" the scope of donor and underwriter acknowledgements to include (1) logograms or slogans which identify and do not promote, (2) location information, (3) value neutral descriptions of a product line or service, and (4) brand and trade names and product or service listings. (1984 Order at 263.) That action was taken as another step in our ongoing effort to strike a reasonable balance between the financial needs of public broadcast stations and their obligation to provide an essentially noncommercial service. It was our view that "enhanced underwriting" would offer significant potential benefits to public broadcasting in terms of attracting additional business support and would thereby improve the financial self-sufficiency of the service without threatening its underlying noncommercial nature. In this regard, we emphasized that such announcements could not include qualitative or comparative language and that the Order should not be construed as allowing advertisements as defined in Section 399B of the Communications Act. Id.”

In the mid 80s the commission “enhanced” underwriting to a level that would provide...

“significant potential benefits to public broadcasting in terms of attracting additional business support and would thereby improve the financial self-sufficiency of the service without threatening its underlying noncommercial nature.”

Obviously, this occurred years before LPFM ever existed. It was also before the incredible changes to the advertising industry that have occurred since.

It certainly was a less competitive advertising/underwriting economy in the 80s.

Today the rules for “Enhanced Underwriting” may be suggested to work for a full-power NCE-FM where 6,000 watts is commonly the *lowest power* used by FM stations, however for LPFM stations, where the highest power is just 100 watts, these rules do not work and do not even protect FM from commercial influences as it seeks to do (*Appendix G*).

Just Do The Math

- 1- Class A NCE-FM reaches 28.3km to the 60 dBu contour.
- 2- 100 Watt LPFM reaches 5.6km to the 60 dBu contour.
- 3- Class A covers a little more than 5 times the area LPFM does.
- 4- A class A probably reaches more than 5 times the potential population. If all things are equal, the class A probably reaches 5 times the potential fundraising businesses... or underwriters... as well.

If this is true, then:

- 1- The typical class A station might reach twenty-five potential businesses who could become underwriting partners, the typical LPFM station can reach about five.
- 2- With these numbers, an underwriter business at the class A station would be 4% of it's billing.
- 3- An underwriter at the LPFM would be 20% of its billing.

The lower the power, the *more important* each businesses becomes to the

radio station. When an underwriter is responsible for 20% of a station's billing, they are extremely important to downright vital. In this scenario, an underwriter at an LPFM is 5 times more important than an underwriter at the NCE-FM class A.

Underwriter Strength Scale

STATION CLASS	DISTANCE TO 60 DBU CONTOUR	HYPOTHETICAL UNDERWRITERS	UNDERWRITER STRENGTH	STRENGTH OF STATION vs LPFM
LPFM, L1	5.6 KM	5	20%	1
CLASS A	28.3 KM	25	4%	5
CLASS C3	39.1 KM	40	2.5%	8
CLASS C2	52.2 KM	50	2%	10
CLASS C	91.8 KM	90	1.1%	18

1- Class A's Influence from Commercial Underwriters vs LPFM

Class A NCE-FM is 5 times stronger against commercial influence than LPFM.

Class A NCE-FM has potential underwriter pool five times bigger than LPFM.

-Losing an underwriter's business is much less harmful to the Class A than the LPFM. The said underwriter is only one out of twenty-five underwriters on the Class A - due to broadcast coverage on the LPFM; they are one of just five.

2- Class C3's Influence from Commercial Underwriters vs LPFM

Class C3NCE-FM is 8 times stronger against commercial influence than LPFM.

Class C3 NCE-FM has potential underwriter pool eight times bigger than LPFM.

-Losing an underwriter's business is much less harmful to the Class C3 than

the LPFM. The said underwriter is only one out of forty underwriters on the Class C3 - due to broadcast coverage on the LPFM; they are one of just five.

3- Class C2's Influence from Commercial Underwriters vs LPFM

Class C2 NCE-FM is 10 times stronger against commercial influence than LPFM.

Class C2 NCE-FM has potential underwriter pool ten times bigger than LPFM.

-Losing an underwriter's business is much less harmful to the Class C2 than the LPFM. The said underwriter is only one out of forty underwriters on the Class C2 - due to broadcast coverage on the LPFM; they are one of just five.

4- Class C's Influence from Commercial Underwriters vs LPFM

Class C NCE-FM is 18 times stronger against commercial influence than LPFM.

Class C NCE-FM has potential underwriter pool eighteen times bigger than LPFM.

-Losing an underwriter's business is much less harmful to the Class C than the LPFM. The said underwriter is only one out of ninety underwriters on the Class C - due to broadcast coverage on the LPFM; they are one of just five.

As it can easily be seen, LPFM relies on each potential underwriter more

than any NCE-FM relies on each of their underwriters, which is because LPFM has a much smaller pool of underwriters to call upon.

If an LPFM is to lessen the influence of an underwriter, it must enlarge the pool of potential underwriters.

How can LPFM enlarge the pool of underwriters?

1- It can raise power to the higher ERPs that NCE-FM uses.

2- It can convert to a service that broadcasts full commercials and add the additional small businesses who do not buy underwriting (*there are very many these days*) to the pool of potential underwriters.

FOR UNDERWRITERS, IT’S A NEW WORLD NOW

“Sorry, I just spent the last of our budget on ‘Justin’s Blog’”

It is a new world for today’s advertisers. They see many more salespeople each week with lots of new advertising methods. In the end, the size of the underwriting budget for LPFM is left with a few donations and then, typically, next to nothing.

AD MEETINGS - 1950	AD MEETINGS - 2000	AD MEETINGS - TODAY
TV	TV	TV
RADIO	RADIO	RADIO
BILLBOARDS	BILLBOARDS	BILLBOARDS
BENCHES, SIGNS	BENCHES, SIGNS	BENCHES, SIGNS
MOBILE	MOBILE	MOBILE
AERIAL	AERIAL	AERIAL
DIRECT MAIL	DIRECT MAIL	DIRECT MAIL
TRADITIONAL	TRADITIONAL	TRADITIONAL
NEWSPAPER	NEWSPAPER	NEWSPAPER
TELEMARKETING	TELEMARKETING	TELEMARKETING
PRINT/MAGAZINE	PRINT/MAGAZINE	PRINT/MAGAZINE
FLYERS/SIGNS	FLYERS/SIGNS	FLYERS/SIGNS
	TABLETOP, REST	TABLETOP, REST
	PRODUCT PLACEMENT	PRODUCT PLACEMENT
	INFOMERCIALS	INFOMERCIALS
	PROMO MERCHANDISE	PROMO MERCHANDISE
	VIDEO PRESENTATIONS	VIDEO PRESENTATIONS
	CABLE TV ADS	CABLE TV ADS
	THEATER ADS	THEATER ADS
		BLOGS/VLOGS
		PODCASTS
		NEWSLETTERS
		REVIEW WEBSITES

		LOCAL DIRECTORIES
		BANNER/TILE ADS
		VIDEO PRE-ROLL ADS
		AUDIO PRE-ROLL ADS
		IN STREAM RADIO
		EMAIL SPAM BLASTS
		MOBILE & TEXT ADS
		GAS PUMP VIDEO ADS

Considering the challenges finding financial support described by commercial radio and the destruction of almost 600 LPFM radio stations in the last 15 years, it is unconscionable that LPFM is forced by the FCC to fend for itself in the fierce fundraising warfare of 2015 with NCE-FM weapons more appropriate for last century.

Today's LPFM stations need rules more appropriate for today's LPFM stations.

HD2 + TRANSLATOR = NEW LOCAL COMMERCIAL FM

The FCC allows the creation of a fully commercial broadcast service more than twice the power of LPFM (250 watt) when it allows FM full power stations to rebroadcast their 100% digital HD secondary sub-signals on FM translators.

Although, under FCC rules, FM translators are prohibited from originating their own programming and limited to just 30 seconds of local origination time per hour, the FCC has controversially allowed translator stations to rebroadcast in standard analog FM the audio of an HD Radio channel of the primary station the translator is assigned to. This also allows full power station owners, who already usually own multiple stations locally and nationally, to avoid the rulemaking process of changing the table of allotments as would be needed to get a new separately-licensed station, and to avoid exceeding controlling-interest caps intended to prevent the excessive concentration of media ownership. This also allows the wealthiest radio group owners to avoid the auction process for new commercial FM radio stations. Such new translator stations also may occupy a footprint in which several LPFMs might have been licensed otherwise.

The HD2 radio sub-channel, with very limited public adoption, becomes really nothing more than a digital STL (studio to transmitter link) in this case. In the end, that allows the commercial broadcaster to launch new, fully commercial 250 watt FM stations - *without any auction process*. In a world where LPFMs are being pushed off the air, the FCC should find it in the public interest to extend a similarly effective loophole to the LPFM rules.

Here are the translator rules we are all familiar with:

§ 74.1231 Purpose and permissible service

§ 74.1231 (g) “The aural material transmitted as permitted in paragraph (f) of this section shall be limited to emergency warnings of imminent danger and to seeking or acknowledging financial support deemed necessary to the continued operation of the translator. **Originations concerning financial support are limited to a total of 30 seconds an hour.** Within this limitation, the length of any particular announcement will be left to the discretion of the translator station licensee. Solicitations of contributions shall be limited to the defrayal of the costs of installation, operation, and maintenance of the translator or acknowledgements of financial support for those purposes. Such acknowledgements may include identification of the contributors, the size or nature of the contributions and advertising messages of contributors. Emergency transmissions shall be no longer or more frequent than necessary to protect life and property.”

The Loophole

If your station is full power, ignore the above rule. Instead, use the secret unwritten rule where you can broadcast to the translator via an HD2 (STL) channel and magically create a new 250 fully commercial FM radio station.

This is proof that **new commercial service** on FM can be created ***without auctions***; as it has been done for the wealthiest radio group owners. It is in the public interest to extend this to the LPFM service as well; to stop this failing service from sending back FCC processed and approved licenses and CPs. It is LPFM that should be getting new commercial service grants; not just the wealthy operators of full power commercial radio stations.

NONCOMMERCIAL RULES ON LPFM DON'T WORK

Who has more influence over a radio station's programming?

- a. 1 advertiser out of 50?
- b. 1 advertiser out of 5?

The answer is: **B** (*of course*)

LPFM - Current Rules	LPFM- Commercial
5 Underwriters	50 Advertisers
1/5 or 20% of station's total underwriter number.	1/50 or 2% of station's total client number.
<p>When all things are equal, one underwriter can be 18% more influential to a station's bottom line than one commercial advertiser would be on a fully commercial equivalent LPFM.</p> <p>The smaller the market, the more commercial the noncommercial LPFM service becomes; the more influential the underwriter is to the noncommercial station's bottom line and, potentially, its programming.</p>	

The current FCC rules forces LPFM stations in small town USA to give unprecedented influence to its commercial underwriters.

LPFM: COMMERCIAL INFLUENCE PROTECTION?

When you ask why the noncommercial part of the NCE-FM rules was forced upon LPFM, you hear how important it is that the current rules protect LPFM programming from the influence of commercial interests.

...which is impossible with NCE-FM underwriting rules; at least when applied to low power FM radio.

In fact, we challenge that the current rules actually give local businesses *more* control over LPFM programming, especially in small towns.

Here's how:

In every coverage area, there is a certain percentage of businesses who will buy radio ads... and a smaller portion of businesses who will try an LPFM with a donation to a non-commercial radio station's underwriting campaign.

For the sake of argument:

MAJOR CITY (1,000,000 or more) - 1000 potential advertisers - 100 potential underwriters

SMALL TOWN (50,000 or less) - 50 potential advertisers - 5 potential underwriters.

When the rules are kept as they are:

MAJOR CITY LPFM programming is influenced by 100 potential underwriters.

SMALL TOWN LPFM programming is influenced by 5 potential underwriters.

When the rules allow full commercials on LPFM:

MAJOR CITY LPFMs are influenced by 1000+ commercial & community outlets.

SMALL TOWN LPFM is now influenced by 50+ commercial and community outlets.

Everyone knows that it is not the number of clients a radio station has that influences its programming; it is the number of *influential* clients you have that really control programming. When the pool of prospects is smaller, every advertiser or underwriter in the pool increases in *influence*.

The smaller the signal, the *more* each underwriter means to your operation and the *more* it can influence a station's programming. This means that the programming of noncommercial LPFMs are usually more easily influenced by commercial businesses than they would be as fully commercial stations. This cannot be the literal translation of the intent behind the LCRA's noncommercial mandate. In fact, it appears to move toward the exact opposite goal.

LOCAL LPFM STATIONS MUST BE PROTECTED

LPFM stations have easily grown to levels that make them irreplaceable to their coverage areas. However, within the LPFM community, a constant “black cloud” hovers... warning not to risk too much time or effort developing or improving these “temporary radio stations.”

LPFM, the smallest of all of FCC licensed services, is mandated to be local and is often part of a nonprofit’s outreach to do good in the community. Yet, it is the easiest to destroy if a full power FM radio station owner has a nearby FM station and does not like the competition. They just move the transmitter.

That is bullying, borderline anti-competitive behavior and not in the interest of the overall public good. Yet it still occurs as LPFM is just a secondary service in the FCCs eyes. The protection of the LPFM local mandate alone should be reason enough to make LPFM a primary service, where possible, under the guidance of the LCRA.

However, a literally reading of the rules even shows that LPFM has been needlessly treated as a secondary service through misinterpretation of the Sec 5 of the LCRA and we request that this be remedied immediately.

Current 73.809 Rule Text:

73.809 Interference protection to full service FM stations

(a) If a full service commercial or NCE FM facility application is filed subsequent to the filing of an LPFM station facility application, such full service station is protected against any condition of interference to the direct reception of its signal caused by such LPFM station that operates on the same channel or first-adjacent channel provided that the interference is predicted to occur and actually occurs within:

(1) The 3.16 mV/m (70 dBu) contour of such full service station;

(2) The community of license of such full service station; or

(3) Any area of the community of license of such full service station that is predicted to receive at least a 1 mV/ m (60 dBu) signal. Predicted interference shall be calculated in accordance with the ratios set forth in § 73.215 paragraphs (a)(1) and (a)(2). Intermediate frequency (IF) channel interference overlap will be determined based upon overlap of the 91 dBu F(50,50) contours of the FM and LPFM stations. Actual interference will be considered to occur whenever reception of a regularly used signal is impaired by the signal radiated by the LPFM station.

(b) An LPFM station will be provided an opportunity to demonstrate in connection with the processing of the commercial or NCE FM application that interference as described in paragraph (a) of this section is unlikely. If the LPFM station fails to so demonstrate, it will be required to cease operations upon the commencement of program tests by the commercial or NCE FM station.

(c) Complaints of actual interference by an LPFM station subject to subsections (a) and (b) must be served on the LPFM licensee and the Federal

Communications Commission, attention Audio Services Division. The LPFM station must suspend operations within twenty-four hours of the receipt of such complaint unless the interference has been resolved to the satisfaction of the complainant on the basis of suitable techniques. An LPFM station may only resume operations at the direction of the Federal Communications Commission. If the Commission determines that the complainant has refused to permit the LPFM station to apply remedial techniques that demonstrably will eliminate the interference without impairment of the original reception, the licensee of the LPFM station is absolved of further responsibility for the complaint.

(d) It shall be the responsibility of the licensee of an LPFM station to correct any condition of interference that results from the radiation of radio frequency energy outside its assigned channel. Upon notice by the FCC to the station licensee or operator that such interference is caused by spurious emissions of the station, operation of the station shall be immediately suspended and not resumed until the interference has been eliminated. However, short test transmissions may be made during the period of suspended operation to check the efficacy of remedial measures.

(e) In each instance where suspension of operation is required, the licensee shall submit a full report to the FCC in Washington, D.C., after operation is resumed, containing details of the nature of the interference, the source of the interfering signals, and the remedial steps taken to eliminate the interference.

Proposed 73.809 Rule Text:

73.809 Interference protection to full service FM stations

(a) All stations in the LPFM service are primary services and will function with all of the same FCC spectrum and technical protection and comparative processes as all other primary stations, except during times when the FCC is licensing new FM translator stations, FM booster stations, and low-power FM stations.”

Local Community Radio Act (LCRA) Discussion

SEC. 5. of the Local Community Radio Act states:

“The Federal Communications Commission, when licensing new FM translator stations, FM booster stations, and low-power FM stations, shall ensure that—

(1) licenses are available to FM translator stations, FM booster stations, and low-power FM stations;

(2) such decisions are made based on the needs of the local community; and

(3) FM translator stations, FM booster stations, and low-power FM stations remain equal in status and secondary to existing and modified full-service FM stations.”

Section 5 (3) has been misinterpreted by the FCC to mean that LPFM stations should be secondary to existing and modified full-service FM stations universally and full-time.

This is not true.

The congressional mandated law, read literally, says:

“The Federal Communications Commission, when licensing new FM translator stations, FM booster stations, and low-power FM stations, shall ensure that”

This only defines a time period that is during the time when a new LPFM is licensed. All other times, they are free from this regulation.

That means the only time LPFM must be equal to the FM translators and FM boosters is during the licensing of a new LPFM station.

It also means, quite literally, that during that very defined time is only when LPFM must be secondary to full-service stations. How can it be read any other way?

LPFM is a live and local service that deserves protection and should be made a primary service immediately.

LPFM OWNERSHIP LIMITS AND TRANSFERS

So many LPFM radio stations have been sent back to the FCC in the last 15 years (590+) that it is almost epidemic now.

When a failed, yet FCC approved, CP or license gets sent back to the FCC, it cheats the community out of radio station choices for news, information, education, and emergency information; often the town's only potential FM voice, if it is small. It is a horrible waste of FCC resources, licensee & supporter money, local nonprofit licensee time and more to continue to allow so many stations to perish due to poor regulations enforced next to operational reality. Licensees should not be expected to invest thousands of dollars in order to lose it all; having to throw their LPFM licenses away in the end.

Invest if you wish, but be prepared to lose it all? *What is the sense in that?*

Good radio stations are the result of hours of patient art, passionate development, and lots of money. The reward is improved community support, both intangibly or in the "goodwill" development and financially. It is a good, proven system: it encourages good public service, creativity, and great radio. As a greater radio station is built, it becomes more valuable to the community and financially independent of support from the operator.

This arrangement enables creators an incentive toward developing a radio station that can truly be a full public servant, a work of art, and financially able to provide the tools for further and improved radio broadcasting.

Transfers:

Stations are valuable to their communities and that is why their licenses should never be sent back to the FCC, if it can be avoided. If there is a distressed licensee and a qualified potential licensee is nearby, the license should never be lost by the community. Current rules allow such an injustice. In this petition, we propose changes in the rules that prevent this from happening.

Ownership:

Current rules allow tribal nations the opportunity to operate two station LPFM duopolies. Considering the state of LPFM and the amount of failed stations, we feel that this benefit should be extended across the entire service to all licensees. All licensees should be able to create an “LPFM duopoly,” allowing ownership of up to two LPFM stations, as current rule §73.855 (b) for tribal applicants allows.

The benefits would be immediate and astounding. Communities would not lose their radio services. LPFMs should not be sending nearly as many licenses back to the FCC; especially in such a short time, just 15 years. Radio stations are more important to their communities than that and, once so many people have worked so hard to receive FCC approval for construction, should not be shut down so easily.

That said, we propose changes to three FCC rules.

Current 73.865 Rule Text:

§73.865 Assignment and transfer of LPFM licenses.

(a) Assignment/Transfer: No party may assign or transfer an LPFM license if:

(1) Consideration promised or received exceeds the depreciated fair market value of the physical equipment and facilities; and/or

(2) The transferee or assignee is incapable of satisfying all eligibility criteria that apply to a LPFM licensee.

(b) A change in the name of an LPFM licensee where no change in ownership or control is involved may be accomplished by written notification by the licensee to the Commission.

(c) Holding period: A license cannot be transferred or assigned for three years from the date of issue, and the licensee must operate the station during the three-year holding period.

(d) No party may assign or transfer an LPFM construction permit at any time.

(e) Transfers of control involving a sudden change of more than 50 percent of an LPFM's governing board shall not be deemed a substantial change in ownership or control, subject to the filing of an FCC Form 316.

[73 FR 3216, Jan. 17, 2008]

Current 73.855 Rule Text:

§73.855 Ownership limits.

(a) No authorization for an LPFM station shall be granted to any party, if the grant of that authorization will result in any such party holding an attributable interest in two or more LPFM stations.

(b) Notwithstanding the general prohibition set forth in paragraph (a) of this section, Tribal Applicants, as defined in §73.853(c), may hold an attributable interest in up to two LPFM stations.

(c) Notwithstanding the general prohibition set forth in paragraph (a) of this section, not-for-profit organizations and governmental entities with a public safety purpose may be granted multiple licenses if:

(1) One of the multiple applications is submitted as a priority application;
and

(2) The remaining non-priority applications do not face a mutually exclusive challenge.

[78 FR 2107, Jan. 9, 2013]

Current 73.860 Rule Text:

§73.860 Cross-ownership.

(a) Except as provided in paragraphs (b), (c) and (d) of this section, no license shall be granted to any party if the grant of such authorization will result in the same party holding an attributable interest in any other non-LPFM broadcast station, including any FM translator or low power television station, or any other media subject to our broadcast ownership restrictions.

(b) A party that is not a Tribal Applicant, as defined in §73.853(c), may hold attributable interests in one LPFM station and no more than two FM translator stations provided that the following requirements are met:

(1) The 60 dBu contours of the commonly-owned LPFM station and FM translator station(s) overlap;

(2) The FM translator station(s), at all times, synchronously rebroadcasts the primary analog signal of the commonly-owned LPFM station or, if the commonly-owned LPFM station operates in hybrid mode, synchronously rebroadcasts the digital HD-1 version of the LPFM station's signal;

(3) The FM translator station(s) receives the signal of the commonly-owned LPFM station over-the-air and directly from the commonly-owned LPFM station itself; and

(4) The transmitting antenna of the FM translator station(s) is located within 16.1 km (10 miles) for LPFM stations located in the top 50 urban markets and 32.1 km (20 miles) for LPFM stations outside the top 50 urban markets of either the transmitter site of the commonly-owned LPFM station or the reference coordinates for that station's community of license.

(c) A party that is a Tribal Applicant, as defined in §73.853(c), may hold attributable interests in no more than two LPFM stations and four FM translator stations provided that the requirements set forth in paragraph (b) of this section are met.

(d) Unless such interest is permissible under paragraphs (b) or (c) of this section, a party with an attributable interest in a broadcast radio station must divest such interest prior to the commencement of operations of an LPFM station in which the party also holds an interest. However, a party need not divest such an attributable interest if the party is a college or university that can certify that the existing broadcast radio station is not student run. This exception applies only to parties that:

(1) Are accredited educational institutions;

(2) Own an attributable interest in non-student run broadcast stations; and

(3) Apply for an authorization for an LPFM station that will be managed and operated on a day-to-day basis by students of the accredited educational institution.

(e) No LPFM licensee may enter into an operating agreement of any type, including a time brokerage or management agreement, with either a full power broadcast station or another LPFM station.

[78 FR 2107, Jan. 9, 2013]

Proposed 73.865 Rule Text:

§73.865 Assignment and transfer of LPFM licenses.

(a) Assignment/Transfer: No party may assign or transfer an LPFM license if the transferee or assignee is incapable of satisfying all eligibility criteria that apply to a LPFM licensee.

(b) A change in the name of an LPFM licensee where no change in ownership or control is involved may be accomplished by written notification by the licensee to the Commission.

(c) A license cannot be transferred or assigned where consideration promised or received exceeds the depreciated fair market value of the physical equipment and facilities for three years from the date of issue, and the licensee must operate the station during the three-year period.

(d) No party may assign or transfer an LPFM construction permit where consideration promised or received exceeds the depreciated fair market value of the physical equipment and facilities.

(e) Transfers of control involving a sudden change of more than 50 percent of an LPFM's governing board shall not be deemed a substantial change in ownership or control, subject to the filing of an FCC Form 316.

[73 FR 3216, Jan. 17, 2008]

Proposed 73.855 Rule Text:

§73.855 Ownership limits.

(a) No authorization for an LPFM station shall be granted to any party, if the grant of that authorization will result in any such party holding an attributable interest in three or more LPFM stations.

[78 FR 2107, Jan. 9, 2013]

Proposed 73.860 Rule Text:

§73.860 Cross-ownership.

(a) Except as provided in paragraphs (b), (c) and (d) of this section, no license shall be granted to any party if the grant of such authorization will result in the same party holding an attributable interest in any other non-LPFM broadcast station, including any FM translator or low power television station, or any other media subject to our broadcast ownership restrictions.

(b) A party that is not a Tribal Applicant, as defined in §73.853(c), may hold attributable interests in two LPFM stations and no more than four FM translator stations provided that the following requirements are met:

(1) The 60 dBu contours of the commonly-owned LPFM station and FM translator station(s) overlap;

(2) The FM translator station(s), at all times, synchronously rebroadcasts the primary analog signal of the commonly-owned LPFM station or, if the commonly-owned LPFM station operates in hybrid mode, synchronously rebroadcasts the digital HD-1 version of the LPFM station's signal;

(3) The FM translator station(s) receives the signal of the commonly-owned LPFM station over-the-air or via any standard analog or digital means; and

(4) The transmitting antenna of the FM translator station(s) is located within 64.2 km (40 miles) for LPFM stations located in the top 50 urban markets and 128.4 km (80 miles) for LPFM stations outside the top 50 urban markets of either the transmitter site of the commonly-owned LPFM station or its rebroadcasted translator or the reference coordinates for that station's community of license.

(d) Unless such interest is permissible under paragraphs (b) or (c) of this section, a party with an attributable interest in a broadcast radio station must divest such interest prior to the commencement of operations of an LPFM station in which the party also holds an interest. However, a party need not divest such an attributable interest if the party is a college or university that can certify that the existing broadcast radio station is not student run. This exception applies only to parties that:

(1) Are accredited educational institutions;

(2) Own an attributable interest in non-student run broadcast stations; and

(3) Apply for an authorization for an LPFM station that will be managed and operated on a day-to-day basis by students of the accredited educational institution.

(e) In the event of an emergency or depending on licensee assessed community need, an LPFM licensee may enter into an operating agreement of any type, including a time brokerage or management agreement; with either a full power television broadcast station or another LPFM station. A LPFM may also enter into a time brokerage agreement with full power FM stations; however, such time may not exceed 42 hours per week.

[78 FR 2107, Jan. 9, 2013]

BROADCASTS FOR CHURCHES AND NONPROFITS

It is beyond reason that an LPFM that is required to be local by law cannot work with a local church without placing restrictions on the broadcast that water down the emotional drive, spiritual passion and the real meaning of the service. Further, LPFMs should be able to help any and all nonprofits in its coverage area.

Unclear rules that cause hesitation during a time of emergency can cost lives.

We propose a “*commercial safe harbor*” policy for all LPFM stations regarding any church or nonprofit organization; enabling the freedom to broadcast their messages and requests for support freely, as a method of truly serving our communities and, hence, the public interest. LPFM would also be able to fundraise as partners or on their behalf.

All dealings with these groups would be prefaced with an automatic waiver from the NCE-FM underwriting rules.

There are two groups affected.

- 1- Churches
- 2- Nonprofit organizations

In order to fully serve its community, an LPFM should be able to reach out and help the most important public servants in the community further their programs and projects. Often, there are ways where the two passions see eye to eye and both groups can help each other; in dual beneficiary fundraisers, enabling block programming for churches, schools, and other community groups. Each city and town is different; however, the smaller towns seem to be more dependent on LPFM than the larger ones.

Churches

Imagine, for a moment, you are the pastor of the church. Your job is to inspire the existing congregation to new heights and to attract and motivate new members. Often, the job of a pastor is to convey a spiritual and religious message that reflects the tenets, beliefs, and creeds of his particular faith. Being a pastor can be a very uniquely responsible position. People depend on you to give them spiritual guidance, in your words, your actions, and with the appropriate emotions and doctrines of their denomination. As would be expected in a free society, religious voices from the community should be able to freely express their faith congruent with their beliefs and the overall public good.

The current rules regarding the noncommercial state of LPFM, even toward churches, forces American pastors to “snap out” of their passionate, emotional states and to watch *very carefully* how they word what they are saying. In real world talk, it puts a “governor” on the free speech of the pastor and waters down the broadcast.

Our local church pastors ought to be able to make statements that are actually illegal “call to action” phrases; statements that inspire the audience to attend church. (IE: “Come on down to the church every Sunday....”)

Many biblical passages are “comparative statements” and “call to actions” in themselves.

Many towns have hundreds of churches, each who would love to broadcast on our LPFM stations. Sunday morning prime-time hours are limited and a system to fairly share it with our communities often requires the need to place a financial production fee on the broadcast. As such, the whole process regarding the broadcasting of Sunday morning church services becomes a business deal and must legally find jurisdiction under the NCE-FM underwriting rules. This should not be!

We ask that all LPFM stations receive waivers from the noncommercial rules when it comes to church or public service based broadcasts. Church programming should be allowed to be passionate and fully free to allow the subject of each broadcast to express themselves spiritually on the public airwaves. LPFM rules should never interfere with or hinder that personal right.

Some might say that relief from this rule would mean relief of an intrusion by government into areas of religion it should not be in. We do not want to make it that deep of a discussion in this filing. Instead, we will say that we feel that censoring pastors' speech is probably not a good thing. The FCC, LPFMs and any other governmental authority ought to tread carefully around this area.

As such, we would like for this rule change & waiver qualification to happen quickly.

Nonprofit Groups

If LPFM is to truly serve its small community as envisioned by both its creators and the FCC in the early stages, it must be able freely, without question or attorney consultation, be able to raise money and create benefits for local nonprofit groups. How shocking it is that “third-party fundraising” could preclude fundraisers like:

Fundraising and charitable drives for local food banks.

Red Cross fundraising even during times of emergency.

*These types of fundraisers are the **nature** of public service. If an LPFM cannot benefit its community in real and local ways, how can that be public service or good for the station’s educational focus?*

***Honestly, why even turn on the transmitter?** NCE-FM programming on an FM might be best delivered via the internet in most cases anyhow.*

Public interest is obvious. NCE-FM restrictions on public service for LPFM are needless and serves no real purpose. In some cases, they risk public safety. When interpretations are required, often, so are attorneys. Those types of consultations take time and always come with significant expenses.

LPFM stations should be able to help every deserving church and group in its coverage area; freely, without limitations on speech.

Applying noncommercial rules toward both churches and nonprofits for LPFM, even during times of emergency, is not in the public interest, violates public safety and is a mandate from the LCRA that is misinterpreted. The FCC’s LPFM rules should not place unnecessary obstacles between these groups and their community radio stations. It is time to remove all burdens for those stations who do actually wish to serve their communities.

Current 73.503 (d) Rule Text:

§73.503 (d) Each station shall furnish a nonprofit and noncommercial broadcast service. Noncommercial educational FM broadcast stations are subject to the provisions of §73.1212 to the extent they are applicable to the broadcast of programs produced by, or at the expense of, or furnished by others. No promotional announcement on behalf of for profit entities shall be broadcast at any time in exchange for the receipt, in whole or in part, of consideration to the licensee, its principals, or employees. However, acknowledgements of contributions can be made. The scheduling of any announcements and acknowledgements may not interrupt regular programming.

As LPFM is not actually an NCE-FM station, this rule can easily separate the service from third party fundraising issues by applying a rule like this to the LPFM rules.

****New Rule: 73.### Churches and Nonprofit Groups***

73.### To increase LPFM's ability to function as a more effective public servant during times of emergency, or at any other time, LPFMs may raise funds during broadcasts that feature nonprofit groups and churches.

Further, both groups may use comparative and call to action statements during their broadcasts and function as if the broadcast were commercial on-air and via administrative fundraising means; with no NCE-FM related restrictions on speech or business relationship.

Licenses are the best judges of how and whom to help and should be able to work with groups & churches toward forwarding local goodwill through fundraising campaigns, live broadcasts, radio-thons, etc. Noncommercial content rules make that impossible. LPFM stations should be able to help any nonprofit group or church that they deem worthy.

LPFM FORFEITURE FAIRNESS

LPFM is forced to have a signal sixty times smaller than the smallest class of NCE-FM (Class A), extra fees for LPFM certified broadcast equipment, all the worst rules of the NCE-FM service and other challenges; yet, it's still forced to pay full-power NCE-FM sized fines for LPFM sized infractions (Appendix D).

The FCC must reduce all forfeitures for LPFM to an appropriate scale to create a level, appropriate playing field for underpowered LPFM. This is *forfeiture fairness*.

LPFM is currently paying 100,000 watt fines with 100 watt transmitters. A \$10,000 fine to a 100,000 watt NCE-FM is not the same fine to a 100 watt LPFM. It may be the size of a day or two's income for the full power NCE-FM; however, it would typically be more than a year's income to the LPFM.

Given all of the survival challenges for LPFM, this is an area that we beg the commission to review quickly. When the fines are flipped backwards via scale, they are as if an NCE-FM was fined over half a million dollars for an underwriting "comparative statement" or equivalent sized offense. Obviously, this would not be fair either.

***Equality of scale:** We propose that fines for LPFMs be reduced by a factor of twenty when compared to typically equivalent fines for the same infraction for NCE-FM. True scale would be 60 - as 100 watts times 60 = 6,000 (the power of a class A) - however, real world numbers seem to accomodate the reduction of twenty times as LPFM scale.*

In other words, something that could be fined at \$10,000 for an NCE-FM would be divided by a factor of twenty when applied toward an LPFM.

Size Of The Offense:

When an NCE-FM breaks a rule, due to their larger radio signal, they may break that rule in 30-40 US counties.

If an LPFM breaks the same rule, their small signal may mean that they only did so in about one US county.

Traditionally, American justice has deemed an infraction to be smaller when less jurisdictions are involved.

For instance: A car chase in one county is usually less of an infraction than one that involves many counties and states. Punishment is usually less for infractions that occur in one jurisdiction as .

Not to mention that the amount of people who are adversely affected by an infraction are greatly multiplied when the infraction is done on an NCE-FM station vs an LPFM.

No station should ever violate a rule; however, if they did, it is certainly not an equitable punishment for an LPFM as it is for an NCE-FM.

If a content rule like airing commercials is broken:

The NCE-FM station probably charged much more for the ad campaign that violated the rule. They can make enough money to cover an infraction very quickly when they are 100,000 watts. An infraction on this station might easily get paid quickly.

The LPFM probably did not make much from their infraction - certainly not enough to cover the cost of a fine. LPFMs may sell on air messages for very little. Infractions and fines may put LPFMs off the air permanently.

CERTIFICATION FOR LPFM TRANSMITTERS

LPFM operators are no different than any other radio station operator. They should both hire qualified local engineers to build their stations.

Originally, it was assumed that the new stations would be “radio scofflaws” out to create an uprising by destroying the US FM radio band. Pirates at the time encouraged home-built transmitters and text was even in some petitions advocating for this. Today, however, there is no record of band destruction that could suggest LPFM was more of a risk to the integrity of the band than any other service. Nothing different exists in physics that should require an LPFM station to have to use an LPFM certified transmitter.

Yet the FCC still requires LPFMs to spend up to \$2,000-\$3,000 more per station construction to use “certified” FM transmitters. Put the responsibility of proper operation in the hands of the local radio engineer, who probably also handles other local certification-free FM stations as efficiently and legally. LPFM stations General Managers (GMs) are no less educated about RF tech than full-power commercial FM GMs. Both should to hire a good local engineer.

Since 2001, forcing licensees of LPFMs to use certified transmitters might have been a engineering profiling necessity; however, continuing this policy today is really just a case of a crime looking for a criminal. The FCC has decided to disenfranchise LPFM and impose extended financial considerations upon the entire service, in case an LPFM breaks a rule. Still no report or other proof shows any demonstration of any effectiveness that the certification rules have had in preventing bad broadcast behavior.

After 15 years of “trouble-free service,” this paranoid FCC technical preoccupation should dissipate as well as this FCC rule for LPFM.

Please change the text of FCC rule 73.1660.

Current 73.1660 Rule Text:

§ 73.1660 Acceptability of broadcast transmitters.

(a)(1) An AM, FM, or TV transmitter shall be verified for compliance with the requirements of this part following the procedures described in part 2 of this chapter.

(2) An LPFM transmitter shall be certified for compliance with the requirements of this part following the procedures described in part 2 of this chapter.

(b) A permittee or licensee planning to modify a transmitter which has been approved by the FCC or verified for compliance must follow the requirements contained in §73.1690.

(c) A transmitter which was in use prior to January 30, 1955, may continue to be used by the licensee, and successors or assignees, if it continues to comply with the technical requirements for the type of station at which it is used.

(d) AM stereophonic exciter-generators for interfacing with approved or verified AM transmitters may be certified upon request from any manufacturer in accordance with the procedures described in part 2 of the FCC rules. Broadcast licensees may modify their certified AM stereophonic exciter-generators in accordance with §73.1690.

(e) Additional rules covering certification and verification, modification of authorized transmitters, and withdrawal of a grant of authorization are contained in part 2 of the FCC rules.

Proposed 73.1660 Rule Text:

§ 73.1660 Acceptability of broadcast transmitters.

- (a)(1) An AM, FM, LPFM or TV transmitter shall be verified for compliance with the requirements of this part following the procedures described in part 2 of this chapter.

- (b) A permittee or licensee planning to modify a transmitter which has been approved by the FCC or verified for compliance must follow the requirements contained in §73.1690.

- (c) A transmitter, which was in use prior to January 30, 1955, may continue to be used by the licensee, and successors or assignees, if it continues to comply with the technical requirements for the type of station at which it is used.

- (d) AM stereophonic exciter-generators for interfacing with approved or verified AM transmitters may be certified upon request from any manufacturer in accordance with the procedures described in part 2 of the FCC rules. Broadcast licensees may modify their certified AM stereophonic exciter-generators in accordance with §73.1690.

- (e) Additional rules covering certification and verification, modification of authorized transmitters, and withdrawal of a grant of authorization are contained in part 2 of the FCC rules.

LPFMs SHOULD USE FM TRANSLATOR TECHNICAL RULES

Separate technical rules for LPFM and FM translators hinder an important local service and cause unneeded administrative challenges at the FCC.

Translator rules have proven to be very effective in both FCC administration and in general FM spectrum efficiency. Being able to upgrade to the limits of contour overlap, within the rules set forth for FM translators, enables important US communities better access to LPFM programming.

FM translator rules make sense for current and future administrative streamlined processes at the FCC and also for both the LPFM and FM translator services. Both are somewhat equal in physics and coverage area (FM and lower power); it makes sense to enable both to have the same technical spacing & RF operational rules. We propose that the following changes happen to the LPFM technical rules:

Current rules:

FM Translator Rules

LPFM Translator Rules

Proposed rules:

LPFM/FM Translator Rules (*current FM translator rules*)

There is not one good reason why, given the same RF characteristics, the two services should require two completely different sets of technical rules. It is an additional burden to the commission, LPFM licensees, consulting engineers and others; and is not supported with one good reason; an important technical change that is overdue. Boosters and FM translators share rules; LPFM should join them on the same technical rules line.

Change Multiple Technical Rules For LPFM

1- Please eliminate the following LPFM rules: ***All technical rules from 73.801-73.845***

2- Please copy the appropriate rules from the FM translator service to the LPFM service rules: ***All technical rules from 74.1201-74.1250***

LPFM Boosters

We feel that LPFMs can benefit from higher powered boosters in areas with unique topography. We propose that LPFMs could use boosters with power levels of up to 200% of the main station's class maximum ERP.

Current 74.1235 (e) Rule Text:

(c) The effective radiated power of FM booster stations shall be limited such that the predicted service contour of the booster station, computed in accordance with §73.313 paragraphs (a) through (d) of this chapter, may not extend beyond the corresponding service contour of the primary FM station that the booster rebroadcasts. In no event shall the ERP of the booster station exceed 20% of the maximum allowable ERP for the primary station's class.

Proposed 74.1235 (e) Rule Text:

(c) With the exception of LPFM stations, the effective radiated power of FM booster stations shall be limited such that the predicted service contour of the booster station, computed in accordance with §73.313 paragraphs (a) through (d) of this chapter, may not extend beyond the corresponding service contour of the primary FM station that the booster rebroadcasts. In no event shall the ERP of the booster station exceed 20% of the maximum allowable ERP for the primary station's class. LPFM stations may use boosters with ERPs of up to 200% of the main station's maximum class ERP and may extend their signals with such.

WHAT'S WITH THE CALL LETTERS?

“So, what’s that mean? LP? Do you guys play a bunch of LP records or something?”

Currently, LPFM stations are allowed to use the traditional four-letter call sign system; however, with the mandatory addition of the “LP” suffix in areas of official communications and in the top of the hour legal ID.

§73.3550 subsection “f” of the FCC rules says:

Requests for new or modified call sign assignments.

(f) Only four-letter call signs (plus an LP, FM, TV or CA suffix, if used) will be assigned. **The four letter call sign for LPFM stations will be followed by the suffix “-LP.”** However, subject to the other provisions of this section, a call sign of a station may be conformed to a commonly owned station holding a three-letter call assignment (plus FM, TV, CA or LP suffixes, if used).

The statement in bold...

The four letter call sign for LPFM stations will be followed by the suffix “-LP.”

...makes the “-LP” suffix part of LPFM’s official call letters.

Proposed 73.3550 (f) Rule Text:

Requests for new or modified call sign assignments.

(f) Only four-letter call signs (plus an LP, FM, TV or CA suffix, if used) will be assigned. *LPFM stations may use the “FM” suffix or no suffix if there is no conflict with another service. Where there is a conflict, the LPFM must use the “LP” suffix.* However, subject to the other provisions of this section, a call sign of a station may be conformed to a commonly owned station holding a three-letter call assignment (plus FM, TV, CA or LP suffixes, if used).

Discussion:

Most listeners to LPFM stations find the “LP” addition to the calls in the legal ID as awkward and something “out of the norm.” The truth is that neither AM, FM or any service is forced to add such an unusual suffix to their legal ID. It sometimes needlessly confuses the LPFM audience into wondering if they are listening to a real radio station at all. Not good in times of emergency. The audience has been trained for years to *understand* their radios with a very defined rule structure..

There is absolutely no good reason to force LPFM stations to add a mandatory and confusing “LP” to the end of their call letters - either at the top of the hour or in general. “LP” stands for “low power.” Explaining that fact often minimizes an LPFM’s perception or effectiveness in front of listeners and especially in front of potential financial supporters. An LPFM is every bit an FM station as a full class C. Most listeners can’t tell the difference between one or the other and there are plenty of potential call letters left.

The additional “LP” call letter serves no purpose and actually hurts the effectiveness of LPFM’s toward serving their communities; both in general

and during times of emergency, when doubt about a station's purpose should never occur.

That said, we respectfully ask that...

1- LPFMs are allowed to identify themselves with or without the "FM" or "LP" suffix during the station legal ID if their 4 primary calls are unique. However, LPFM stations *must* identify themselves with the "LP" suffix if their 4 primary calls are *not* unique.

Proposed Change

Current: **"WXXX-LP, Anywhere"** (*Legal*) - **"WXXX, Anywhere"** (*Not Legal*)

Proposed: **"WXXX-LP, Anywhere"**(*Legal*) - **"WXXX, Anywhere"** (*Legal*)

2- Where there is no competing call in any other service (AM, TV or FM), the LPFM may attach the "-FM" suffix to their call sign in the place of the "-LP" suffix. Once filed with a call sign change, this would become their official suffix during station ID and in all official communications.

Proposed Change

Now: **"WXXX-LP, Anywhere"** (*Legal*) - **"WXXX-FM, Anywhere"** (*Not Legal*)

Propose: **"WXXX-LP, Anywhere"**(*Legal*) - **"WXXX-FM, Anywhere"** (*Legal*)

Why is this in the public interest? The public has accepted the current method of assigning local radio station call letters. Forcing a new “-LP” suffix confuses the public and leads them to wonder if they are even listening to a real radio station. Further, the abbreviation “LP” is ingrained in US culture with an association to a “long-playing” record; or, an “LP,” another name for a record “album” in the 60s, 70s, & 80s.

The LP suffix is just confusing to most people. Why should the LPFM radio service assign its call letters by power level when there is no “HP” suffix for more powerful stations?

If it is not important for an AM or FM full power station to identify itself as “W***-AM” or “W***-FM”, it should not be any more important during a legal ID to identify an LPFM with the confusing, unnecessary “LP” suffix.

Public Benefits:

-Removal of the “LP” suffix will maintain familiar, the half-century-old call letter assignment plan that the public is already accustomed to. Having “LP” as a suffix and having to explain that it means “low power” is almost a badge of shame for some stations. It is unnecessary and its entire nomenclature should be abandoned in favor of the traditional FM call letter assignment system.

-A station not tethered to the “LP” suffix can be assured “broadcast confidence” from its listeners.

-A “non-LP suffixed” LPFM station is better accepted by businesses, agencies and the public as “real radio” and legitimate.

-An “LP suffixed” LPFM station might be misunderstood and, during times of emergency, neglected in favor of a far away, more “trustworthy” real station.

AM REVITALIZATION & LPFM

Two failing local radio services can collaborate to become a single effective service; saving each.

AM is the most traditionally based of all of the local radio services. When FM radio left small towns in 1992 and after the rule changes in 1996, it was the AMs who stayed and gave local radio one more chance. For those radio stations, it meant:

- 1- Less competition from the FM station that moved out of town.
- 2- They were instantly granted an official local emergency steward.

However, even with this advantage, decades of research have proven that there's still problems with the AM radio service. Many problems in fact; most unovercomable technical challenges. Recent statements by Chairman Wheeler at the NAB illustrates that the FCC already knows this. AM is in such bad shape that it can no longer function as a local service alone. Technical challenges and audience habits make it such a challenge that one of the primary solutions being shopped around is to move it a new, expanded FM band. Truly, *no one is listening*.

We would challenge that the critical mass in a new expanded FM band would take well over five years to have any impact on the real public's radios; if it ever does. Look at HD radio. It has been tremendously promoted, supported and angled and it still has not caught on. Does anyone remember the regulatory lessons from AM stereo?

LPFMs, on the other hand, are already occupants of the most valuable property in many small towns. *Commercial band FM*.

To their audiences they are already capable of providing superior local service and many have spent years building credibility as the "local FM

station.” In many small towns, the population may know the name and dial position of the local, recently constructed LPFM well, over the name and dial position of an AM that has been in town *for many more years*.

Allow willing LPFMs to lease (or LMA) their FM stations to AM stations who are struggling. This would require a commercialized LPFM service as well. This could go a long way toward turning two failing local services into one, effective local service. This is much preferred over the current state of both services.

Another option should be to allow the LPFM to broadcast commercials and become a local servant all on its own.

Two things should change in the current rules to allow this:

1- LPFMs should be allowed to broadcast fully enhanced underwriting or typical “commercials.”

2- LPFMs should be allowed to rebroadcast and lease its programming to an AM licensee.

Two failing services might combine- when the situation is right - into a successful one. Everyone wins... especially the potential audiences in both coverage areas.

CONCLUSION: LPFM NEEDS FCC SUPPORT

LPFM is a service that is dying a very real death. Almost fifty dozen (600) LPFM stations have been destroyed since 2000. A couple are already dead from the latest window (2013). The FCC has the power to fix things and should using it to save this important and potentially *vital* American resource.

*“We continue to be concerned about the potentially preclusive effect of a strict local “residency” requirement and do not believe that local sources are the only valuable sources of information and service. **Nonetheless, this service is intended to respond to the highly local interests that are not necessarily being met by full-power stations.**” - FCC MM Docket No. 99-25 (D-1, 33)*

LPFM wants to be this service. However, LPFM cannot become the important service the commission defined it to be due to its own restrictive rules. Without added commercials, more power, and primary status, the FCC ties the hands of LPFMs such that they cannot fulfill the basic mandate of LPFM as codified by law and FCC policy.

Two simple truths.

1- Local public safety responsiveness can be more quickly handled by local LPFM radio than a full power from a town 30 miles away; but only if the LPFM has the resources it needs.

2- The LPFM will not have the resources it needs to be able to respond to important public safety and community interests; even if no other station is doing so, without the ability to broadcast commercials, primary service and the coverage area of FM translators.

Another truth:

1- Licensees of LPFMs will never invest greater sums of money and resources without assurance that they will not be swept away by encroaching stations.

Who would invest the thousands of dollars that many radio broadcasting and community tools, knowing that it could all go down the drain?

LPFM licensees want to become valuable public servants; however, a looming threat to our possible station destruction is created by the current LPFM rules.

1- LPFMs can be displaced and destroyed by any full power station that chooses to perform an engineering move.

2- When it comes time to sell the station, there will be no return at all on the investment as the station cannot sell for more than fair value of the equipment.

It becomes an investment made only by those who like to throw money away. These days, there's not many of those, especially at the commercial-free LPFM.

FCC Efficiency

1- Creating one set of technical rules for both FM translators and LPFMs regarding spacing, ERP, & HAAT make good, efficient sense. Not only will it finally satisfy an audience who contacts our stations daily begging for more power, this change will enable further FCC efficiency, hence public interest benefits, in the following areas:

- a. Training of future FCC staffers.
- b. Easier understanding by the public of LPFM radio service.
- c. One legal past of technical changes and precedents instead of two.
- d. Decreased workload in rules maintenance, other agency workload.

Better signal for listeners to LPFM, decrease in workload for the FCC, easier to understand rules for licensees and consulting engineers; a real public interest win.

LPFMs are the only FCC licensed service that is mandated to be *local*. This makes it one of the most important public resources available on any dial. If LPFM was worth creating; it is worth saving. The rule changes we propose in this *Petition for Rulemaking* will not only give relief to the now very savvy operators of LPFM stations, they will once again enable a full local radio experience for *all* of America; not just the major markets. The rule changes will provide for *small town FM radio* again, where local owners had local contests, local charity drives, local news, and many more ties to their small towns. Local talent trained in small towns before moving to the “majors.” Almost every word on every live talk break, commercial, and station jingle had the *name of the town in it*.

We’ve gone backward. Years ago, responsive local emergency broadcast coverage for small town USA was faster, small town economies were stronger and radio, as a whole, was better. Imagine the opportunity we have here. With a few small changes, radio dials could easily return to how good radio dials were; before one or two quick FCC rule changes ruined them all. Local economies could flourish again. Small businesses would be able to afford to buy ads on FM radio and not be forced to purchase airtime from a station far away; grouped into huge spotsets with irrelevant, and even brand competing businesses.

LPFMs want to be local. The FCC should re-enable local radio service and important public safety coverage for small town USA. After all, it was a

few small FCC rule changes that took everything away. We ask that the Commission place this *Petition for Rulemaking* on the docket so we can forward the important local LPFM radio service and every station therein with “real world radio,” licensee proposed steps that will finally enable localism, emergency local radio coverage, small town pride on the FM dial, and an upgrade in power that will provide enough coverage for each station to effectively reach their audience. The rule changes proposed in this *Petition for Rulemaking* will instantly revitalize LPFM; which is a statistically dying FCC broadcast service. They also can be used in conjunction with AM revitalization, local economic improvement programs, and more. If the commission were to adopt all of these changes, LPFM would not only gain sustainability; it would enable stability for other threatened radio services (AM), which could improve services toward a more richly diverse and locally focused local FM radio community across America.

Incredible problems deserve incredible fixes. This petition is a true, actual *licensee backed* representation of what we view as fast and powerful fixes.

We are very thankful for your consideration and, hereby, request docket addition of this petition.

Respectfully Submitted,

/S/

Dave Solomon

Executive Director, Low Power FM Advocacy Group (LPFM-AG)

Senior Curator, <http://LPFM.Audio>

Post Office Box 422

Taylors, SC 29687

July 27, 2015

APPENDIX A: LICENSEE CASE STUDY SUBMISSIONS

The following submissions are a series of real world submissions from actual LPFM licensees who were asked to submit their thoughts on the following changes:

1- If adding commercials to LPFM was necessary.

2- If adopting translator technical rules was a good idea.

3- If LPFM should be considered a primary service by the FCC.

Some submissions were short and sweet and others were more in depth. Some were even emotional. All are true life for LPFM in America. In this petition, there are more than four dozen.

LPFM is struggling, like no FCC service ever has. It's time for the service to stop sending in failing licenses and to begin on a path of public service, effective education based programming and locally-based, responsive FM radio.

Please consider the changes in this petition as you read the following submissions.

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>WXXR-LP, Terre Haute, IN <i>Received From: Douglas Kirkham</i></p> <p><i>Date Received: April 24, 2015</i></p>
<p>Thank you for considering the common sense, grassroots issues that I am presenting to you. I begin by saying that I believe in the United States government's ability to become once again, an institution trusted by its constituency. I say this not to be negative, but truthful. Integrity is what makes this nation great, and it is what I expect from all of my leaders. I thank you for demonstrating integrity to myself and my children. Approval ratings for government are at all-time lows, because the American people are struggling. I hear almost every politician from both sides of the aisle saying during every election cycle that "Mom and Pop" small businesses are the backbone of the nation. You say that you want small business to remain competitive, and a large part of the economic recovery that we all long for. I happen to work for a very small</p>	

business, which labors under seemingly unreasonable government restrictions. These unjust rules decrease my ability to compete with my corporate competitors. I am speaking of locally owned and operated LPFM radio. Now, I understand why board members must live close to the transmitter site. That restriction keeps large corporations from procuring LPFM licenses, and operating them remotely from unreasonable distances from the community that the LPFM station is to serve. It does help those like me, that want the local “community” feel of the media returned to the airwaves. The restrictions, however, that cripple us do not serve our station’s best interests, or the “Mom and Pop” businesses that underwrite our station. The restrictions that I speak of are those that keep us from making calls to action to our listenership, and that do not allow us to speak of the quality of our underwriters’ goods and services. These restrictions serve only to give our competitors at the large corporate stations an unfair advantage over us in the market place. It gives them the opportunity to blow the whistle to the FCC, and attack a small competitor, much like a wolf pack taking down a limping lamb. We serve the community in a way that corporate radio cannot. With our low overhead and expenses, we can actually put your mother’s back porch bakery on the air at a rate she can afford. Corporate radio charges much too much for small businesses to get to the airwaves competitively. However,

many potential underwriters turn us away because we are bound by FCC fetters that will not allow us to produce quality commercials for them. We have played all of the word games and look for creative ways to stay in compliance with the FCC regulations, and still please those that want to be heard on our station. Now we go back to listen to you on the campaign trail. From both sides of the isle you say passionately that you believe in small business and want small business to prosper. We have heard you say it, and I believe you are people of integrity and common sense. That is why the American people elected you. It seems to me that you should have no issue coming together in agreement with one another to lift the noncommercial restrictions from LPFM radio stations that serve small and rural communities. Many also serve larger cities with small businesses wishing to be known among their corporate competitors. Those of us that work for LPFM stations operate on tight budgets, and struggle to feed our families, simply for the love of bringing small business an opportunity to compete, and to keep our community entertained and well informed.

We cannot contribute large amounts to campaigns or pay lobbyists as our corporate competitors can. All we can do is compel you to operate in fairness, and move swiftly to remove our economic shackles that serve only the well-funded and established corporate radio giants. I would love to tell my listeners, as well

as my underwriters that our representatives in government, regardless of party affiliation, opened the floodgate of fairness for local LPFM stations. low power, does not mean low influence. Our listeners and underwriters are loyal, and they trust us because we operate in integrity. I am all for free markets, as long as they are fair markets. We are well aware that big radio corporations have more power, more reach, and more resources with which to try to sway your attention away from this pressing matter, and we accept that. All we are asking for is the chance to give our “Mom and Pop” underwriters the same opportunity to ask our listeners to visit their establishments that the businesses advertising on corporate radio have. Level the playing field for us, and watch the grass roots, small business economic revivals begin. This letter is being brought to you by Dave Solomon of the LPFM Advocacy Group, of which I am a proud member and supporter. He will call your attention to the specific restrictions that keep us from being able to compete with the giants. How many more LPFM Stations must turn in their licenses, or labor under FCC fines for simply trying to compete with corporate radio? We thank you for hearing us, your constituents.

Douglas D. Kirkham
Chief Marketing Officer
WXXR X97.3 FM, The Bird
Terre Haute, IN

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>WRLY-LP, Raleigh, NC <i>Received From: Steven White</i></p> <p><i>Date Received: April 30, 2015</i></p>
<p>Hi,</p> <p>Here are Triangle Access Broadcasting's opinions re an LPFM Petition for Rulemaking. These aren't hard and fast, but they are the current thinking.</p> <p>1) Fines</p> <p>Not really much of an opinion other than "Fines should of course be congruent with the seriousness and scale of the violation." Triangle is not convinced that existing rules and Enforcement Bureau actions don't already reflect this, but we really haven't followed it that closely.</p>	

I do not have enough information to comment specifically re WQAZ-LP. except to note that the forfeiture, as part of a consent decree, has a voluntary element. Unless more information is divulged, I'm not persuaded by the one incident to find fault with the current system other than "it's government."

2) LPFM as enhanced-secondary status

I support this since investments into programming deserve some protections, and the uncertainty that a station is always "at risk" weighs into investment decisions.

Stations that make (and meet) the same local-origination pledges required to get the additional tie-breaker comparative point should be afforded protection. (Note: I strongly support the REC proposal for the reduced local-origination hours with a view that many non-local programming sources can still effectively serve the community.)

With an enhanced secondary status, LPFM would still be subject to displacement by full-power stations. Triangle would ask that a) displaced LPFM stations would be allowed 12 months after going silent to file a major change application (without a

substantial transfer of control in the LPFM), and b) unless the full service licensee/permittee identifies an open displacement channel for the LPFM at its current location, any commonly owned translator of the full service station would become secondary for the purposes of the LPFM making its change (but the LPFM change could only displace one translator at most).

3) LPFM technical rules matching translator technical rules

Absolutely Triangle believes that translators and LPFM should be converged to the extent possible. If LPFM cannot be moved towards translators rules due to distance separations, then move the translator rules towards the LPFM rules. For Triangle, this convergence implies the same maximum 250W ERP, and it means using the same "type verified" equipment. Because of distance separation rule requirements, this probably means the alignment should be with non-fill-in translators (maximum 250W, de-rated with HAAT) rather than fill-in translators (250W ERP at any height).

Triangle is not receptive to increasing LPFM beyond 250W ERP at this time.

The slight power increase, however, is Triangle biggest wish. We would like to see LPFM signals penetrate building structures within a 3 mile zone, including into our own studio. We also think that it is not always practical to locate right at the center of a community. This can be to channel availability, local ordinances, or environmental factors. A balance of ERP vs. the targeting a of a minimal service was already solved in the transmitter service. Triangle believes 250W is the right next step.

4) Commercials

Since only non-profit entities are eligible to hold LPFM licenses, Triangle believes there is room for more "enhanced underwriting." We consider the current policies overly restrictive, but we do not believe that "commercials' in the sense of "buying ad time" is viable due to a legal restriction.

Triangle proposes allowing statements of fact when not combined with other promotional language. For example, pricing information or inducements available to the general public could be permissible while calls to action and

unattributed comparative language would remain impermissible.

Under this model:

Allowable: "City Motors offers new vehicles starting at \$10,000."

Prohibited: "City Motors offers the lowest prices with new vehicles starting at only \$10,000."

Allowable: "The first 100 visitors will receive a free T-shirt."

Prohibited: "Stop by as one of the first 100 visitors to receive a free T-shirt."

Allowable: "Community News readers awarded Fitness Gym the 'Best Value' award."

Prohibited: "Fitness Gym provides the best value among all local fitness centers."

Prohibited: "Fitness Gym costs less than A Better Body."

Ultimately, I like the track that Michi has taken with the REC P4RM. She was apparently going for a completely "grantable" P4RM, unmodified. From my seat, she seems to have thoroughly considered quite a bit to reach that document. I do think the LPFM

community should at least ask for more of its wishes, though, at least where there is a reasonable shot at getting them. At this point, I'm not sure if a separate P4RM or comments on REC's is the best way to accomplish this, but I look forward to seeing any proposals.

Sincerely,

Steven White

Director, Triangle Access Broadcasting,
Inc.

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>KDXI-LP, St. George, UT <i>Received From: Perry Holmes</i></p> <p><i>Date Received: April 28, 2015</i></p>
<p>Dave:</p> <p>In total support of your efforts..</p> <p>Our organization operates KTIM-LP (soon to be KDXI-LP) in St. George Utah. I've been at this since the original window in 1999. Bumped 2X since then, but excited that we will have a new location at 100.3FM in the next few months that should bring us much better coverage and more protection. So I know the battle first hand. Secondary status is a big killer for LPFM and a change in the 'underwriting' rules would certainly go a long way.</p> <p>Whatever else I can do to help, please let me know.</p> <p>Regards,</p> <p>Perry Holmes</p> <p>GM/Director</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>KLKE-LP, Granite Shoals, TX <i>Received From: Bill Turner</i></p> <p><i>Date Received: April 29, 2015</i></p>
<p>Hello Dave,</p> <p>As a holder of a CP for KLKE-LP, Granite Shoals, Texas. I would like to offer the following:</p> <p>OVERVIEW</p> <p>I find Low Power FM operators a rather unique blend comprised of radio wannabe operators, ministry outreaches, well meaning community groups and dedicated broadcasters. Many of these licensees know little of the industry and make choices that are not the wisest options for serving their area. I also find many struggling dedicated broadcasters trying to truly serve their communities while severely handicapped by FCC rules. Low Power FM will always perform at less that envisioned until these</p>	

rules are relaxed. In reviewing the FCC Rules, as a station manager, I look at how we can make what exists already fit another use so that I can save time, labor and funds for other uses. I see where the FCC can simply 'plug in' LPFM at various spots in the FCC rules that will not create a logistic nightmare and preserve the already meager FCC funding.

1) COMMERCIALS/FURTHER ENHANCED UNDERWRITING

In the nonprofit world beyond the FCC regulations, non-profit organizations enjoy the opportunity to raise funds in a much more limitless way. If they have a publication or other non-FCC regulated media it is perfectly fine to accept commercial advertising. Why is it if there are no restriction on whether there is commercial content outside the FCC regulations? Why does the FCC have the rules in the first place? What purpose does noncommercial serve?

The typical radio listener/average radio listener cannot distinguish between an acceptable and unacceptable Underwriting Announcement. They can distinguish between the screaming car dealer

commercial and the typical low key Underwriting Announcement. If you were to play 5 Underwriting Announcements and 5 Commercials for a typical radio listener and ask them to state which one is a commercial and which one qualifies as an Underwriting Announcement, they specifically could not say. For example a Paul Harvey voiced commercial would likely be identified as equal to the Enhanced Underwriting Announcement. My point is only those who know the rules know the difference.

With the backbone of America's economy being the small business, many times the single location Mom and Pop business, now more than ever the backbone of our economy is in survival mode. With extremely limited advertising resources they can afford and the proliferation of large companies competing for their customers, they are threatened more than at any time in our history. Low Power FM, being forced by their mere coverage area, to be 'local', is an affordable venue to sustain and improve the health of the small business. Look at Main Street rural America. Look at urban blight. Quite frankly, the single location business typically has to spend the majority of their scarce advertising dollars to reach people that will never become their customer because the business model of media has required servicing a greater geographic area in order to survive. We know most customers come within the 5 to 8 mile primary trade area. This alone, for

the health of the American economy, should be why Low Power FM stations should be afforded the opportunity to bolster the health of the small, single location Mom and Pop business.

Where I hold a Construction Permit for a Low Power FM, every newspaper, every radio station and the cable TV option offer only three county coverage. The small single location business can advertise in an insignificant and infrequent way in any of this media and I guarantee \$4 of every \$5 spent goes to reach people that will never be a customer simply based on geography. Regular and consistent marketing is always the best choice, if you can afford it. Such businesses are already at a disadvantage with big box stores showing up and nation chains undercutting them. If I could run a commercial, I might sway a few more to their doors, keeping the community more economically viable.

Granted commercial frequencies must be auctioned per the dictate of Congress. There is no reason an exception cannot be crafted to permit certain classes of stations to accept limited advertising even with rules and or limitations on percentage of programming. Sure the NAB and others will balk but the harsh reality is they cannot afford to service the small business and that small business cannot afford to advertise with them. Their customers are not

interested in the LPFM option because they need greater reach to succeed. If the FCC were to craft such, I should hope the 'limit' in content would be based on an overall annual 'percentage' versus something like the 'thirty seconds per hour' for translators. My reasoning is some communities are reasonable and merchants prefer to advertise while they are open for business, not midnight to 6 in the morning, for example.

The FCC need only look to our neighbors to the north where the CRTC does permit their Low Power equal to run up to 4 minutes an hour in commercial advertising. There is not public backlash from this limited commercial policy.

LPFM stations should be allowed to be commercial, perhaps with certain parameters.

PRIMARY STATUS FOR LPFM

I cannot, for the life of me, understand why LPFM stations were not Primary to begin with. The FCC clearly created the class of station to be locally focused radio and then makes it equal in status, even handicapped

in coverage, by the translator FM that rebroadcasts their feed many times of programming originating from across the country with absolutely no local programming, presence or even general awareness in the community.

The Primary Status should have always been the classification of Low Power FM based on what the FCC created it to be. There is no legitimate argument to give preference to a higher powered station that cannot by mere design, serve the local area covered by the LPFM in the customized and localized way the LPFM can. If anything, my radio career has proven 'local' takes the backseat and a station becomes less and less evident the greater the coverage becomes. Secondary status threatens localism and discriminates against LPFM clearly identifying it as the less worthy entity.

TRANSLATOR TECHNICAL RULES

There is no reason the FCC cannot make the wisest use of the spectrum by allowing LPFM to increase to 250 watts as a maximum ERP at the HAAT that allows

said station to 'fill the hole' versus leaving areas without a local signal. Clearly such instances would be in regions where the radio dial offers the public fewer choices and opportunities to receive local signals. In fact, greater coverage can be a much needed safety net for rural areas where emergencies occur and modes of reaching the general public are taxed by a lack of venues to do so. The Superintendent of the school system in Mullin, Nebraska explained the single school district served the entire county and their biggest challenge was reaching the families in the county when weather closed the school. In that rural area, a big storm frequently knocks out power and phones. Cell coverage is nil in this rural area. A 250 watt station can cover the county. 100 watts will not.

REDUCED FINES FOR LPFMS

Generally I find the FCC very understanding and greatly concerned for broadcasters that unintentionally violate FCC Rules. Granted any licensee is charged with knowing FCC Rules and maintaining a facility that abides by FCC Rules. Sometimes we find a violation before it may be reported to the FCC and it is corrected in a timely manner. In other instances it is the local agent at the FCC that makes the operator aware of the issue. In those cases

the FCC is quite understanding if you are simply honest. In some instances ignorance prevails in an otherwise diligent licensee. I find the FCC to be more of a help than an entity on the prowl for cash.

While there is a process for lowering a fine levied, this frequently requires the operator to hire legal council to present the data in a way that can result in a favorable reduction. As one licensee told me, if you're slapped with a \$15,000 fine and get it reduced to \$1,000, you can bet you paid at least \$14,000 in attorney's fees and time/labor to get that done. His point was you don't get close to skirting any rule, moving away from that line in the sand instead of standing at the edge of it.

If a fine should be warranted, I would suggest a 'cap' of a percentage of annual income based on the prior return filed by the IRS and/or in instances of smaller non-profit entities that do not have to file a return, the results of their past fiscal year denoting the monies received during that year. I am in no way suggesting the FCC 'take it easy' on willful and frequent violations by licensees that show disregard for FCC rules, however monetary fines need to be adjusted for the station's income. In fact, it seems a waste of FCC resources to assess a penalty and then spend more time rendering an opinion on a reduction. Nip it in the bud by

requiring financials before you originally assess the penalty.

ADDITIONAL THOUGHTS

The FCC in choosing applicants via the Point System could modify such a system to 'qualify' a 250 watt increase. Perhaps the FCC could offer experimental permits for limited commercial advertising on select LPFMs around the country to determine public reaction and station viability.

One thing not mentioned is the EAS. If we go 250 watts we should fully participate. I want to anyway at 100 watts.

I'm in radio to 'serve'. It never has been about money but all about passion. Naturally I am fortunate to earn a living from the business that has been my passion since I announced records to a pencil in first grade. Well over a half a century later, that passion is still very much alive and well. Many of us are out there. Will the FCC allow us to untie our hands and create our legacy of serving, truly working to increase the local quality of life via that license hanging on the wall. A great radio station is a reflection of life in the community it serves. Let us be great.

The changes we ask for are in synch with the actions of Government. By the FCC's own study on the economic impact of Low Power FM shows the miniscule revenue the typical LPFM generates. In the real world we both realize such figures negate the ability of such stations to serve their communities in a meaningful way.

To assist the economically crippled Low Power FMs is within the scope of Government. The general public in such a situation has help from Government. Every agency recognizes and reacts to make opportunities available whether a small business, persons of various ethnic origins as well as physically and mentally challenged, linguistically challenged and the list goes on. The FCC itself offers concessions in the auction process and filing process to help level the playing field for the hopeful broadcaster. Thus, to dismiss the pleas for assistance is to go against the very actions of Government in general as well as your very own branch. We are not asking to be equal to the full power licensees but rather asking for help in realizing the full potential of the Low Power FM station, an agenda certainly in synch with your purpose for creating the class of station in the first place. To offer assistance only furthers your mission.

<p>Should the FCC choose to allow such changes as described, I feel it fair and just for the FCC to determine some licensees to ‘test the waters’ before making a blanket rulemaking. There are those in the LPFM community that might oppose this, yet they do not fully understand the needs and concerns of each community differ and that each non-profit entity has a different mission. Indeed if their opinions prevail, the closed-minded shall prevail. The LPFM’s intent is to serve the community, not subject itself to only one cause or agenda. The FCC needs to hear all voices and weigh all concerns in an effort to better facilitate LPFM in fulfilling it’s purpose.</p> <p>Bill Turner</p> <p>President</p> <p>Highland Lakes Music Appreciation Society</p> <p>KLKE-LP 92.9</p> <p>Granite Shoals, Texas</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>WMEX-LP, Rochester, NH <i>Received From: Gary Blue</i></p> <p><i>Date Received: April 30, 2015</i></p>
<p>To Whom It May Concern,</p> <p>As a low power broadcaster there are many times when I cannot cover my city of license because of strong interference from a co-channel 50,000 watt over 100 miles away. The solution could be an increase in power to 250 watts or a change of frequency but that would only be possible with permission to use a directional antenna.</p> <p>I feel that my LPFM has filled a large void by producing LOCAL programming that the commercial stations do none of.</p> <p>Thank you,</p> <p>Gary M. Blue</p> <p>Rochester Radio</p> <p>WMEX-LP</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>KWKI-LP, Pahrump, NV <i>Received From: Harvey Caplan</i></p> <p><i>Date Received: April 28, 2015</i></p>
<p>Yes, we agree.</p> <p>Both LPTV and LPFM were established for the same reasons: local-ism for small communities and more diversity in programming. Yet, LPTV stations are allowed to broadcast commercials and LPFM stations are not. This inequality make no sense at all and creates unnecessary hardship for all LPFM stations. FCC, remove the restriction prohibiting the broadcast of commercial material from LPFM stations and eliminate this double standard.</p> <p>Harvey</p> <p>Coming this summer: KWKI 106.9 FM</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>KELS-LP, Greeley, CO KSIK-LP, Greeley, CO KMKZ-LP, Loveland, CO</p> <p><i>Received From: Michael Duvall</i></p> <p><i>Date Received: April 29, 2015</i></p>
<p>I actually represent ownership of KELS lp, KSIK lp, KMKZ lp. Greeley, ft. collins, co.</p> <p>KELS LP was the 3rd most listened to LPFM in the nation in 2012 according to an FCC/Mitre/Arbitron study. We couldn't agree more with the changes you're proposing, including to provide LPFMs a primary status. We nearly lost our frequency and were forcibly sent to a frequency that would have given us approximately 1/4 our range due to interference on that channel....but by the FCCs own study showed us legally displaced!</p> <p>We would have had 15,000 listeners that would have lost the ONLY on air source for Elvis, the Beatles and Frank Sinatra along with interviews with city mayor, school board and U.S. Senators like Cory Gardner and Congressmen like Ken Buck who are both personal friends of mine.</p>	

<p>Most of our signal area would have been exposed to a homogenous Clear channel signal out of Denver smashing us into a 4 block radius of satellite teeny bop hip-hop.</p> <p>Additionally, revenue is so scarce, even the 3rd most listened to LPFM in the nation, that my wife and I and the few members of our organization work endless hours at less than minimum wage. To ad a limited number of ads would not only relieve some of the workload and allow us to hire others, but also allow us to ad programs that have commercials embedded. We have lost a farm report and a nationwide music show AND national news because of the noncomm status of LPFM.</p> <p>Needless to say that our income streams are more limited than any other class of broadcast media. It seems a no brainer to reduce the fines that may be levied on this precise class. We are charged basically the same ASCAP fees as most noncom full service radio stations. We are charged the same streaming fees by SoundExchange. It seems fair to grant us the same protected primary status and at least a fair chance of making a limited number of sales if our business community and our staff is motivated enough to chase it down.</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>KHPP-LP, Sterlington, LA <i>Received From: Chuck Halley</i></p> <p><i>Date Received: April 30, 2015</i></p>
<p>Glory2Glory Educational Foundation is a CP holder for an LPFM station in Sterlington, LA, a small town in rural northeast Louisiana with a population of less than 2,000 people. As President of the Board and General Manager of KHPP-LP, I'm also a Broadcast Consultant who has helped nine other non-profit groups acquire low power stations.</p> <p>I support the Low Power FM Advocacy Group's Petition for Rulemaking because I've seen how difficult it is for these stations to survive with the current LPFM regulations and technical rules. I believe LPFM stations should have the same power output as FM translators, and consequently the same technical rules. With their very limited coverage of up to only 100 watts of power (and most with only a 3 or 4 mile coverage area), it is almost not even worth it to be on the air after paying for equipment,</p>	

programming, electricity, phone lines, Internet service (for the operators who stream their stations), and music licensing fees for the potential listeners they reach with this inadequate ERP.

Also I support the FCC allowing LPFM's to air commercials. There are many informative syndicated shows, news services, and other informational programming available to radio stations on a barter basis, but low power FMs miss out on these free services since they cannot run the spots within the shows (and most LPFM stations I work with surely can't afford paying cash for this programming.)

Please consider making these changes so LPFMs can survive and continue to serve our local communities as this service was initially meant to do.

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>WRKE-LP, Salem, VA <i>Received From: David Mulford</i></p> <p><i>Date Received: April 30, 2015</i></p>
<p>I'm the engineer for WRKE-LP and built the station from the ground up. We were proud to be one of the first LPFM stations in the United States, and take our mission of providing local news and entertainment seriously. We have no paid full time staff - we are staffed mainly by volunteers. Our budget is entirely provided by our parent institution - Roanoke College - otherwise we would have been off the air many years ago.</p> <p>I agree that LPFM is at a distinct disadvantage in terms of being treated as "Second Class" services by the current rules.</p> <p>LPFM stations are required to spend similar amounts of money as larger FM stations on EAS equipment, Antenna systems, engineering expertise and music licensing.</p>	

We're hamstrung in a very tight economy however as we can't sell advertising time to cover our costs, and underwriting without a "call to action" is difficult to obtain because businesses want us to tell people to use their products or services, yet we cannot do so by law. Local people and businesses are less reluctant to "donate" underwriting costs to a small station, with limited reach, with limited (or no) marketing staff to generate awareness about their organization or business - unless there is some guarantee that it may generate a return on investment or revenue for them.

In this difficult fiscal environment, I hope the FCC would at least consider us as equal partners to the larger radio stations in the RF spectrum, with lower power emissions of course.

Everyone in radio is hurting for revenue - especially the LPFM sector.

Please do not allow us to be unfairly hindered by legislation that was enacted by lobbyists like the NAB and NPR that feared we would take away their audiences. LPFM stations deserve to compete in a democratic marketplace, and if a little radio station can somehow outgun NPR, Clear Channel and other well capitalized corporations in our local markets then it would be a win for democracy and the common man.

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>WMRW-LP, Warren, VT <i>Received From: John Barkhausen</i></p> <p><i>Date Received: April 30, 2015</i></p>
<p>WMRW has now been broadcasting to Warren Vt and the parts of the Mad River Valley in Central VT for just over 10 years. During this time we have faced some serious challenges to our viability as community station for our area.</p> <p>1) Rural LPFMs and Community: Our biggest challenge is reaching our entire rural community. The frequency we selected 10 years ago (95.1fm) which was clear when we applied, was encroached upon by the CBC Francais broadcasting out of Montreal on the same frequency at 100,000 watts. This upcoming change was not in the FCC database when we decided on that frequency. Consequently for these past 10 years we have been unable to even cover our entire town of license, Warren, and this has made our station much less viable than it could have been. Happily, we have finally found a frequency (94.5) that is relatively clear, and altho we are having to move our tower 3 miles north,</p>	

to protect other stations on this same frequency, it should greatly improve our coverage in our community.

2) **Translators:**It would be of great help to us and perhaps other LPFM rural stations in mountainous terrain, if we were to be allowed to have a translator in addition to a primary frequency. When we move to our new frequency, we are worried that the listeners who could actually receive us on 95.1 previously, may not be able to receive the new signal on 94.5. With a translator, we could keep our original frequency, and simply add 94.5 as a needed addition.

a) **Protection:** It would also be important to LPFMs in trying to maintaining our coverage and listenership that we have equal rights over our local areas of protection concerning all classes of stations and their encroaching signals, whether from primary signal or translator.

b) **Rural LPFMs should be allowed an area of protection greater than 3 miles to cover their communities:** In our case, 3 miles does not even cover our town of license and it is very frustrating to know that our hard work and financial investment to cover our community, is always vulnerable to encroachment by other stations. As an example, our actual mountain valley community here is about 3 miles wide and 15 miles long and is comprised of 3

<p>towns Warren, Waitsfield, and Moretown.</p> <p>3) Scale potential fines to station size: We have a small listenership, and consequently a small all-volunteer organization, and a small budget. Since any hypothetical transgressions of the rules that might happen for a station of our size would reach very few people, and our ability to pay any fines is severely limited by our micro sized annual budget (\$12,500), we feel a legitimate argument can be made that fines should be greatly or proportionally reduced for stations of our size listenership and budget.</p> <p>Thank you for considering these comments and for your work,</p> <p>John</p> <p>John Barkhausen</p> <p>WMRW General Manager</p> <p>info@wmrw.org</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>WLNT-LP, Loudon, TN <i>Received From: Lynn Richard</i></p> <p><i>Date Received: April 29, 2015</i></p>
<p>I'd like to see....</p> <p>Commercials in some form LPFM stations can survive financially</p> <p>Relax the LPFM transmitter certification rules to be on par with translators</p> <p>Automatic upgrade to 250w where possible (similar to rec search tool)</p> <p>Upgrade to 500 watts where possible with appropriate study completed by a broadcast consultant</p> <p>Allow co-located timeshare LPFM's or separate LPFM's a joint location (ie transmitter site) to share EAS equipment in order to save startup costs.</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>KGIG-LP, Modesto, CA <i>Received From: Brad Johnson</i></p> <p><i>Date Received: April 28, 2015</i></p>
<p>KGIG-LP 104.9 fm Modesto CA</p> <p>We were KQRP-LP 106.1 fm , but had to move our transmitter .6 km to get a better channel so we would not cause 'interference'</p> <p>Lots of cost with never any income...</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>WYHR-LP, Collinsville, IL <i>Received From: Brian Seim</i></p> <p><i>Date Received: April 28, 2015</i></p>
<p>Dave,</p> <p>Here is a quick back story</p> <p>My name is Brian Seim, part of a small group with a CP to build an LPFM. We would have been on the air already but a person who claims to be the real LPFM advocate filed a IO against our groups small move because it did NOT fit her ideals. I suffered a heart attack at the local library during this time and that has really put us back.</p> <p>The irony is that this self proclaimed advocate preaches solidarity yet went against us in our move. NOW, i read this self proclaimed advocate is asking to double the small move in rulemaking. This person is only after her own self interest. This case proves her real colors. IF someone is PRO LPFM, then helping not hindering must be the case in all cases.</p>	

I applied for a 18 month continuance.
waiting for that confirmation or denial.

That is our story in a nutshell. We are ready, have funds waiting and with me being somewhat healthy now, our group is pushing forward.

NOW....

I write to give my support of limited commercials per hour. I truly believe Weather, News and Sports are all LOCAL, ALL COMMUNITY ORIENTED..and that is the main reason for LPFM.

It takes money to thrive and survive. Our group hopes the FCC will allow limited commercials per hour for LPFM. Hard economic times means donations are scarce everywhere.

America is supposed to be the land of EQUAL OPPORTUNITY for ALL MEN AND WOMEN, FAIR TRADE amongst businesses. Why then is LPFM discriminated against and NOT given a FAIR and EQUAL opportunity to flourish as a business?

This needs to change, if only to help LPFM stay alive and uphold the Mission to the communities we serve.

1. It will truly give LPFM's a real chance to do REAL GOOD for the communities
2. It will give mom and pop operations a REAL chance to be competitive in the

<p>communities we serve. IF the big boys cared they would help Mom and Pops afford commercials. They do not care unless the price is right. This is a well known fact and moms and pops are being hurt by not being allowed the opportunity to promote LOCALLY.</p> <p>3. LPFMs being allowed limited commercials and sponsorships. WILL ALLOW MOM AND POP BUSINESSES TO AFFORD TO ADVERTISE.</p> <p>4. Calls to action, even limited per hour, will make a huge change in helping restore local economies.</p> <p>How important is that in this hard economy in communities everywhere. This will be a JOB CREATOR, A LIFELINE to small business everywhere.</p> <p>Folks in DC have a responsibility to serve and allow LPFMs to operate and function AND DO WHAT THEY WERE CREATED TO DO.</p> <p>Be fair to LPFM. Give us the FAIR opportunity that is promised in the constitution. We are not asking for riches, just to be able to flourish and serve.</p> <p>Thank you,</p> <p>Brian Seim</p> <p>WYHR</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>KTDT-LP, Tucson, AZ <i>Received From: Jason LeValley</i></p> <p><i>Date Received: May 2, 2015</i></p>
<p>I have another issue that I believe should be re-considered by the FCC. As an LPFM permit holder in Tucson, AZ, I have been informed that there is a 50 watt restriction due to our proximity to the Mexican border. Everyone knows that we would not interfere with any Mexican stations if we were to broadcast at 100 watts, yet we are legally limited to 50 watts, which greatly reduces our viability.</p> <p>I have heard that there's a way to obtain a waiver but when I contact the FCC, all I get is that we must abide by the 50 watt limit.</p> <p>It's a ridiculous and unfair rule. If we were 10 miles from the border, I could understand. However, Tucson is about 70 miles from the border and 100 watts just don't travel that far.</p> <p>Jason LeValley Downtown Radio Tucson, AZ</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>WZPH-LP, Dade City, FL <i>Received From: Doc Thayer</i></p> <p><i>Date Received: April 29, 2015</i></p>
<p>Yes. Changes. Commercials being allowed.</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>KFUR-LP, St. George, UT <i>Received From: Jessica Ortega</i></p> <p><i>Date Received: May 2, 2015</i></p>
<p>Dave Solomon, Executive Director Low Power FM Advocacy Group</p> <p>Dave :</p> <p>We have studied your proposals for changes on FCC rules for LPFM's, and here at KFUR-LP we feel every single proposed change you suggest, will not only positively impact our ability to serve our Community of Service, but it will also help protect the General Public's Right to a Local Voice.</p> <p>Having been displaced from our original frequency @ 105.1, by a multi-station commercial entity, we know first hand, how it feels to be treated as "a necessary evil" by the Government entity supposed to guard the public airwaves, and keep them public.</p> <p>We have served the Hispanic Community of Saint George, Utah for the past 12 years, and up to a few months ago, we</p>	

were the only Spanish Radio Station serving our Community. We are a 100% minority run Station, and have been providing much needed, News, Information, Sports, Entertainment and Immigration Advice and Education to our loyal listenership.

The same multi-station commercial entity, which displaced us from our original assigned frequency, purchased three additional translators, converted to digital, and created three new Radio Stations in a record time of less than a month just this past January. They are now broadcasting a Spanish Network Music format (JUAN) which offers nothing but computer generated music, (they do not even have any live DJ's) and we are very much afraid, they will soon see us as "competition", as we are very much favored by the Hispanic Community.

We are preferred by the public we serve, as we provide them with important, critical, news and information specifically aimed to our ethnic origins, and we are certainly afraid of their next move, as they have already shown they do have the Power to wipe us out, and we mean not only the financial power, but the FCC rules are currently on their side, to do as they see fit.

They have already approached most of our sponsors telling them we will soon

<p>disappear of the airwaves, in a clear attempt to deprive us of our financial support, and this is a very real concern for us, as we feel a broadcaster with no ties to our ethnic community will never be able to serve our Community's interests better than we are doing now.</p> <p>Jessica M. Ortega / President Latinos Unidos Broadcasting, Inc. KFUR-LP 101.1 FM Saint George, UT.</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>WPCA-LP, Amery, WI <i>Received From: Bob Zank</i></p> <p><i>Date Received: April 28, 2015</i></p>
<p>Dave Solomon,</p> <p>WPCA Radio has been on the air for nearly 12 years, and each year has been a struggle financially. We are very careful about not breaking ANY rules, so fines are not a factor for us. They could be, and if we were to be fined, it would break our station. We operate very close to the vest, financially.</p> <p>We have had to deal with losing our initial place on the dial to a full-power station, and it cost us a lot of money to find another frequency and make the change.</p> <p>That almost broke us, financially.</p> <p>I agree with all four of your 'talking points'. We would love to have more power to increase our coverage area to include more population. It's how we raise money to operate; individual donations. The more population reached the better. And as to commercials, even a limited number would help. And people do consider our station a REAL radio station; it's how we operate. So</p>	

<p>far, underwriting has not been as lucrative as commercials probably would be.</p> <p>Low-Powers are the last gasp of broadcasters doing real service to their communities, taking radio away from the sameness of commercial radio; but they really need the help brought forward in your four 'talking points'.</p> <p>Thanks for the opportunity to express this opinion. I hope it helps influence the F.C.C.</p> <p>Bob Zank, Gen. Mgr. WPCA-LP Amery, WI</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>WUCG-LP, Blairsville, GA <i>Received From: Larry Flegel</i></p> <p><i>Date Received: April 28, 2015</i></p>
<p>Good proposed changes (<i>in the LPFM-AG petition</i>).</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>KHEL-LP, Rogers, AR <i>Received From: Mike Jandebaur</i></p> <p><i>Date Received: April 27, 2015</i></p>
<p>Dave:</p> <p>KHEL-LP is onboard with the same list you have. you may add us to the list of supporting stations.</p> <p>Mike</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>WLPP-LP, Palenville, NY <i>Received From: Cathryn Platine</i></p> <p><i>Date Received: April 27, 2015</i></p>
<p>Increasing power allowed would be great for us...</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>WYRZ-LP, Brownsburg, IN <i>Received From: Shane Ray</i></p> <p><i>Date Received: April 27, 2015</i></p>
<p>Recently I have read about fines imposed on LPFM's across the country that seem to be in line for higher wattage commercial radio stations. While I won't pretend to know the whole story on these situations, I feel the end results have been a bit extreme for non commercial stations. I would like to see a scale that will be fair for the class of the station.</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>WWRT-LP, Conway, FL <i>Received From: Gabriel Castro</i></p> <p><i>Date Received: April 27, 2015</i></p>
<p>To whom it may concern,</p> <p>LPFM has proven to serve the community since its inception more than 10 years ago.</p> <p>While we applaud the commission and its staff for the continued support and dedication, we still believe that there is room for improvement.</p> <p>One of the issues that many LPFM stations have is building penetration inside of the 60 dBu contour. Many of our listeners complain that they can't listen to our station inside their home or place of business. A power increase up to 250 watts should be considered and allowed for LPFM stations based on technical exhibits.</p> <p>Another issue of operating a low power station is financial support. Most of our funding comes from donations from individuals and businesses. Due to power limit and underwriting restrictions it becomes very difficult to cover operating</p>	

<p>expenses. In our case, there were no high building or a tower that was owned by an individual that might helped us to keep operating expenses low, we have to broadcast from a privately owned tower that requires us to have a very high limit of insurance coverage on top of rent, internet, and electrical expenses.</p> <p>We hope that the commission can take into consideration all the issues that are affecting the LPFM service and find a solution that will make the LPFM service stronger for years to come.</p> <p>WWRT-LP WWRT, INC. Conway, FL</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>WTIJ-LP, Bryson City, NC <i>Received From: Robert Lowe</i></p> <p><i>Date Received: April 26, 2015</i></p>
<p>I have investigated the propositions of the LPFM-AG, and must say that I am in agreement with them on the following matters. I firmly believe that LPFMs should have the ability to operate commercially, if they're not licensed by a nonprofit or educational entity. There is very little difference between the nature of an underwriting announcement and a commercial announcement. I personally feel that this is a waste of time and resources for the Federal Communications Commission to continue laboring over the gray area of "is this underwriting or commercialism?" The only way that the FCC could effectively enforce the laws as they are currently written is to have a clear-cut, black-and-white list of regulations. This is unlike the vague ordinances that leave the rules open for numerous ways of interpretation.</p> <p>I also believe that, in a lot of cases, 100 watts is not enough effective radiated power since it is limited to a maximum of about 70 feet</p>	

(100 meters). Understanding the concept of LPFM results in one's reasonable acceptance of the current rulings. However, LPFM is not meant to be "hyper-local". The signal should at least cover an entire city and/or county. In larger areas, the signal may not reach past a neighborhood. So the proposition of adding a translator service, on-band booster, or increasing the height of the antenna is more than a fair gesture. Most stations would have at least one option, if not all three of the aforementioned ones.

LPFM is community radio. Big conglomerates shouldn't be able to take over a local signal simply. Radio has always been designed to work in the public's interest. Let the communities decide whether or not they keep their LPFM or go with the commercial station that seeks the current frequency.

Forfeitures can sometimes seem to be issued randomly in accordance with the current state of the FCC's mood or state-of-mind. Instead of issuing set amounts for forfeitures, it should be determined by calculating a percentage of the station's current billing.

Since I more/less in agreement with the LPFM-AG, I chose to consider this brief essay an endorsement of all of the efforts undertaken by LPFM-AG to maintain and grow Low Power FM stations by working on the behalf and in their best interest.

Robert Lowe, Station Manager
WTIJ 100.7 LPFM

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>KPYT-LP, Tucson, AZ <i>Received From: Hector Youtsey</i></p> <p><i>Date Received: April 28, 2015</i></p>
<p>We have been on the air for almost 10 years. We are very fortunate to be funded by the Pascua Yaqui Tribe and don't have to rely on fundraising. There are two full time paid employees (Myself and my Program Coordinator) and one part time employee (Production Assistant). The rest are volunteers. We don't do underwriting due to being understaffed.</p> <p>I totally agree about the disparity in rules regarding LPFM's and full power stations. We are with you.</p> <p>Regards,</p> <p>Hector Youtsey General Manager KPYT-LPFM</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>WMXP-LP, Greenville, SC <i>Received From: Efia Nwangaza</i></p> <p><i>Date Received: May 2, 2015</i></p>
<p>LPFM must be allowed to do commercials if it is going to survive and provide service to the community. It is not competition with commercial stations. Local businesses cannot afford the commercial rates even when commercial stations take local commercials. Time to increase wattage and allow commercials!</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>WRPO-LP, Russells Point, OH <i>Received From: Gene Kirby</i></p> <p><i>Date Received: April 26, 2015</i></p>
<p>List of 'wants':</p> <p>1000 watts, will settle for 250.</p> <p>COMMERCIAL status.. why not?</p> <p>Thanks, Gene (W8BJN)</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>KLEK-LP, Jonesboro, AR <i>Received From: Ganzie La</i></p> <p><i>Date Received: April 26, 2015</i></p>
<p>We support primary status for LPFM, Translator rules apply to LPFM, more flexibility on underwriting announcements (if commercials will never be allowed at least allow for lpfm and nce stations to allow calls to action and leave the other restrictions in place)</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>WQMR-LP, Rocky Mount, VA <i>Received From: Don Mattingly</i></p> <p><i>Date Received: April 26, 2015</i></p>
<p>What I would like to see and the realities of the service are in flux... At least I would like to see the LP-250 happen... Most of my listeners here are four footed... Relaxation of underwriter rules would be welcomed, however, then I see problems with the additional regs that a regular broadcaster must comply with... So you can see that I have mixed feelings.</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>WXED-LP, Ellwood City, PA <i>Received From: Don Suhan</i></p> <p><i>Date Received: April 26, 2015</i></p>
<p>Let LPFM stations run commercials. Put us on the same grounds as commercial radio.</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>KGCE-LP, Modesto, CA <i>Received From: BJ Mora</i></p> <p><i>Date Received: April 25, 2015</i></p>
<p>To Whom It May Concern:</p> <p>I write these brief comments representing a fledgling LPFM outreach, and my opinions may or may not reflect those of the church whom I serve. We are, Lord willing, planning to sign on an LPFM this summer, so please take these comments in that light.</p> <p>Our outreach is part of a church, yet not a large one. I would guess we are like a lot of Christian radio LPFMs - with someone like me with a past history in radio, resurrecting old skills in a new era; the last time I worked in radio was before computers! And trying to do it on a budget, especially in our economically depressed area.</p> <p>One of my concerns which seems to be common in the LPFM community is whether we can the rules correctly with regards to underwriting announcements. There has been a lot of talk about the dangers of crossing that line from noncommercial into commercial, and as we've seen even in a recent case (WQAZ-LP), such a fine could be large</p>	

enough to cause us to shut down such an outreach. Advice is even out there that LPFMs, though they are NCEs similar to NPR, cannot even use them as examples to follow!

Our outreach does not want to sound like the commercial stations, nor compete with them for their advertising dollars; yet the risk of running afoul of regulations makes us even wonder if we can talk live to other nonprofits and talk about their ministries!

So my suggestions are two: that there be no penalties for infractions of single incident or first time violations of LPFM rules; and two, that if non profit entities are on the air or a subject of a radio broadcast, that there be no penalty for such. Now, for any radio service, if they repeatedly run afoul of the rules, then certainly a penalty may be deserved.

Blessings,

BJ Mora for GraceRadio

KGCE-LP/Modesto, CA

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>WYLA-LP, Charleston, SC <i>Received From: Kevin Crothers</i></p> <p><i>Date Received: April 25, 2015</i></p>
<p>I have no opinion on allowing commercials on LPFM in the commercial band. (It is not applicable to my situation.)</p> <p>I oppose commercials for LPFMs in the non-commercial band.</p> <p>I would be in favor of loosened regulations in regards to underwriting.</p> <p>I am definitely in favor of LPFMs gaining primary status.</p> <p>I am in favor of allowing increased translator use for LPFMs.</p> <p>I am in favor of allowing higher ERP levels for all LPFMs (where engineering studies suggest that it is feasible).</p> <p>Fines for LPFMs should be calculated on a basis that reflects their non-commercial status and power/coverage status in relation to that of full-power broadcasters.</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>WQTP-LP, Columbus, MO <i>Received From: Ray Fisher Toney</i></p> <p><i>Date Received: April 25, 2015</i></p>
<p>LPFM could better serve and help small businesses grow by airing commercials. A lot of these businesses don't have large ad budgets for other commercial stations, so they just choose not to advertise. Lpfm is suppose to be local ,so let's help local businesses grow.we could help the mom/pop stores. We need the same rules as translators to level the playing field as well.</p> <p>Ray Fisher Toney</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>WPFA-LP, Winter Park, FL <i>Received From: Anthony Batista</i></p> <p><i>Date Received: April 25, 2015</i></p>
<p>1- would be the availability to properly advertise a local business for the sake of sponsorships. It would be a bit easier for us to receive funding if we can properly promote a business.</p> <p>2- Would be the ability to raise the watts to possibly 1000 or more to be able to cover a wider audience within our county etc.</p> <p>I believe this would be our main concerns in regards to an LPFM station and FCC rulings etc. Thank you guys a bunch for this, God willing the future shall be bright for us.</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>WCXX-LP, Cincinnati, OH <i>Received From: Bill Spry</i></p> <p><i>Date Received: April 25, 2015</i></p>
<p>For me, POWER POWER POWER. I wish the original Skinner petition had passed. Made the most sense. My group had asked for 250 watts in our petition but it was a compromise on my part. I was for as much power as possible. If the listener cannot hear you, then what's the point.</p> <p>I have found that selling underwriting really is no problem if you present it correctly. I sell just like they are commercials without saying that. Less confusing for the buyer/sponsor. I wish they would expand on underwriting though and let us say more.</p> <p>Those really for me, are the two most important issues. Without power, no one can hear including the sponsors. Without expanded verbiage on spots, the sponsor is not happy.</p> <p>Primary does not really bother me right now because the FCC does give us the opportunity to move to a different channel, in some cases.</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>KMGG-LP, Albuquerque, NM <i>Received From: Byron Powell</i></p> <p><i>Date Received: April 25, 2015</i></p>
<p>I would like a higher wattage.</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>WWWR-LP, Wadsworth, OH <i>Received From: Tim Davisson</i></p> <p><i>Date Received: April 25, 2015</i></p>
<p>Dave...I don't have too much that others haven't said. Sure wish the underwriting rules were much clearer and easier to understand. There is an incredible amount of unsureness among other LPFM operators I've spoken to.</p> <p>The absurdity of the whole thing is...most LPFMs are not supported by colleges or city-of-license tax dollars. Most have small staffs, and must struggle to simply make enough money to stay on the air. I wish the rules would give us a bit more flexibility to raise enough revenue just to survive and realize the tremendous challenges we face just to keep the lights on.</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>WUCR-LP, Lake Butler, FL <i>Received From: Paul Lewis</i></p> <p><i>Date Received: April 25, 2015</i></p>
<p>Thanks for quick response...and thanks for letting me in on a new source of ideas...I am with you on changes to LP....The most difficult thing for us here is acquiring new "customers" that understand what non-commercial radio is and how we must stay away from certain "buzz" words, etc.. action verbs and all the stuff..</p> <p>The prospects want bang for their buck...money is hard to come by...just the money to pay for our overhead takes a lot of energy to gin up spots that might sound OK to you, but sound a little fishy after you listen to them a few times.....so you charge ahead and hope for the best....until the government SUV pulls up in front..</p> <p>Nobody wants to get involved except the high school boys and girls and we have found these youngsters off and on...hard to keep their interest ...</p> <p>Lighten up the commercial rules....I have been LP since there was LP....going into 12 years. I have taken home about \$18,000.00 in that 12 years.....lets see, 8th grade math runs that to</p>	

<p>what, \$1,500.00 a year??</p> <p>You need a "gee whiz" marketing staff to get out there and hustle...they are the people who get the money.</p> <p>You are left with paying the overhead and sustaining....Man, what a hobby!!</p> <p>LP has license for failure....I am not a radio guy...I am a field artilleryman by trade...but thought a small radio station in a small, rural county was needed because the high school had good teams and needed an outlet to get the games to grandmas, grandpas, uncles, aunts, etc..</p> <p>There is our pitch...that keeps us going. But we still have a light bill, telephone bill, equipment maintenance and replacement and all other sorts of bills I am sure you are familiar with.</p> <p>Yes, we need a break in the "underwriting" rules so we can continue and get better at what we do....and who should care if someone makes a little money in the process...This is America...</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>WUOH-LP, Orlando, FL <i>Received From: Efrain Gonzalez</i></p> <p><i>Date Received: April 24, 2015</i></p>
<p>Becoming part of the LPFM community has given me better insight to the challenges and responsibilities involved with being a part of such a great endeavor.</p> <p>Its a responsibility not only to our communities, but also a personal responsibility to uphold and follow all the rules given by the FCC to effectively fulfill that mission itself, to serve the community.</p> <p>However, some of the rules in place make it difficult for us, the small stations, to fulfill that mission. In a market that is mainly covered and overloaded with communication conglomerates, it is kind of hard for small stations to thrive under the pretense that we are forced to work in a manner that only leaves us to ask for sponsors and rely only on the kindness of the community we serve. Although that seems to be the rule in place, the problem with that is that it doesn't really give us the space to be able to plan ahead, or create budgets for upgrades, or even have funds to have fundraisers. Unlike NPR (in my</p>	

market they have 100,000 watts), LPFMs don't have that kind of premium coverage area, or the government funding as a nonprofit (or grant writers ,or even a comprehensible way to access those grants)to be able to sustain ourselves in the same markets or manner as NPR.

With that in mind, I personally would consider ideal for LPFM stations to have at least the ability to better serve the small sponsors that we can get with better messages on the air that are not confined to the underwriting rules that are currently in place.

Also, I understand that the FCC has rules in place that must be upheld, obviously a system needs to be in place for broadcasters (commercial or not) to maintain their standards and practices. However, I also understand that LPFM stations are not owned by conglomerates, or have powerful signals, or have the funds to be able to even get "expert" legal advice in the case we are fined for any type of violation (accidental or not) that we may incur. Which leads me to also request the FCC to put under consideration some way that can enforce the rules, and need be, place fines, but fines that are more consistent to the situation LPFMs are under. in some cases, 1 fine can be more than enough to force a station to shut down permanently, as the cost could be greater than (in reality) be more than all the equipment used to have the station itself on the air.

I'm sure as LPFM start making differences in our communities, the FCC will see the benefit of having more broadcasters be there for their listeners with the purpose to serve and provide educational and entertaining content to those who are served by us, but for that to happen, the FCC needs to understand that LPFMs are not as black and white as commercial stations that have full sales teams, investor backing and millions of dollars at their disposal, or even non commercial national stations that even with government grants (and 200,000 pledge drives every 4 months) serve more than their intended areas, or are mostly based on content that is syndicated or completely irrelevant to the local needs of our listeners. We are small broadcasters that want to be able to have the room to prosper and make something worthy of the people we serve.

I can only hope that the Federal communications commission can understand that for this to happen, we need to have realistic rules in place, and not rules designed around a system that has been standardized by large multimillion dollar corporations that clearly do not represent the true spirit and/or the service community radio provides all over the USA.

Sincerely,

Efrain A. Gonzalez, WUOH-LP

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>KTWI-LP, Liberal, KS <i>Received From: Tim Ingram</i></p> <p><i>Date Received: April 24, 2015</i></p>
<p>We are a local Licensed and on the Air LPFM. We do find some things very hard to supply to the public like we would like to. One of them is at 100 watts we are having a hard time penetrating walls in my local contour. We get a lot of static inside buildings and the tower is located almost center of town. The second thing is we read and read the rules on underwriting this is very hard to follow and we are doing everything we can and feel like we are always having to second guess and still hope we are within the rules and it also makes it hard for us to be able to do weather without a large monthly outlay. As we are a small LPFM we would like these items to be revisited by the FCC.</p> <p>Tim Ingram Liberal Music & Education Foundation 110 Lilac Dr. Liberal Kansas 67901</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>WZRF-LP, Wilmington, NC <i>Received From: John Jeter</i></p> <p><i>Date Received: April 24, 2015</i></p>
<p>We would like to see the politics and favoritism removed and banned from the rules affecting freedom of speech and underwriting announcements. The current rules favor commercial FM's and are severely restrictive to LPFM's...we do not benefit at all from the current rules. We must survive...and the rules need to be modified to allow LPFM's to become a self supporting and completely independent, small business, local community broadcaster.</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>WDXD-LP, Tallahassee, FL <i>Received From: Alan McCall</i></p> <p><i>Date Received: April 24, 2015</i></p>
<p>I think probably primary status for LPFMs may be one of the most important issues. If they are going to be treated like "real" radio stations in other regards, then they should at least be given this protection.</p> <p>I think the power increase to 250 watts is helpful. Since WDXD-LP hasn't quite made it on-air yet, I can't tell for sure how much coverage would be gained. WDXD could increase from 33 watts ERP to 88 watts ERP with second channel adjacency waivers.</p> <p>I don't know what kinds of investments other operators have made into their LPFMs, but there is presently \$24,800 invested in WDXD's build-out, with at least another \$1,200 needed for electrical work. This has pushed us pretty close to that August 6 expiration of the CP. I think an initial 24 months, instead of the current 18 months, or at least that option, would be beneficial.</p> <p>Alan McCall Delta Star Radio of Florida, Inc./WDXD-LP Tallahassee, FL 32311</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>WMYU-LP, Ooltewah, TN <i>Received From: Tim Kochis</i></p> <p><i>Date Received: April 24, 2015</i></p>
<p>You already hit on a couple.</p> <ol style="list-style-type: none"> 1. Primary status. 2. Able to air commercials. 3. LPFM to follow NCE rules for non-commercial and commercial status. <p>If an LPFM is in the commercial band they have a choice to be non-comm or full commercial.</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station’s voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>WOHP-LP, Huntsville, OH <i>Received From: Kevin Fodor</i></p> <p><i>Date Received: April 21, 2015</i></p>
<p>Your proposal for LPFM is far reaching and it does address some concerns other petitioners do not. And, if the FCC truly wishes to have a successful, robust LPFM service that would truly be local in nature, it is important at least some of the issues you have raised be addressed.</p> <p>Though the original petition for LPFM called for commercial service at 1,000 watts, intense lobbying of the FCC by groups representing broadcasters with vested interests in quelling potential competition won out. Whether a commercial service for LPFM can truly be achieved may be of question, but the point you raise about “enhanced underwriting” is valid.</p> <p>Not long ago, a station I represent contacted the Enforcement Bureau with a question about the use of slogans, or “logograms” in underwriting. The best answer that could be achieved from the FCC rep was “If the business has been using the slogan for six months or longer, it is “probably” ok.”</p>	

“Probably ok”? What the hell kind of answer is that? More like the FCC take on obscenity and indecency...”We’ll know it when we see it.” Why does the FCC refuse to speak in clear and understandable terms?

A station in Batavia, Ohio gets fined for having more “items” in an underwriting ad than an inspector apparently liked. What makes an underwriting ad legal with 7 items and illegal with 8? I was involved in an LPFM station 4 years before I heard of this “rule”. And no one at the station had heard of it, either. Despite the fact that all of this station’s underwriting messages avoided comparative statements, “told”, not “sold” and kept all such under 30 seconds in length. Still, I later learn, we had problems with spots that needed to be addressed.

Most LPFM’s, since grant money isn’t available, operate on a budget of a few thousand dollars a year and primarily rely on volunteer staff and high school and college interns, plus computer software to allow these stations to stay on the air 24/7. At best, you can make in the low 5 figures in underwriting revenue annually. In short, this is a business that probably, under the present structure can NEVER support “employees”, even part time to run it.

A couple of things MUST happen:

First...an upgrade to primary service status. One station I am involved with is one of the original LPFM stations. It’s been on the air now for almost 15 years. Imagine how that group would feel if a nearby commercial

broadcaster came to them and said, “Sorry...but I need your frequency for a translator”, and rendered 15 years of hard work moot with a phone call. Is that fair to the local community that LPFM has served? Is that in the public “interest, convenience and necessity”?

Secondly...stations that can upgrade to 250 watt service should be allowed to. An LPFM can, at best, only be somewhat competitive to a local station. Big signal beats little signal in 99% of the situations. Any suggestion that a 250 watt station that might give 5 to 7 mile coverage would give a 3,000 watt station a run for its money could only happen if the larger commercial broadcaster has a station so screwed up, no one WANTS to listen to it. I work with a soon to be LPFM whose license application was delayed by a broadcaster over 75 miles away complaining that the 100 watt LPFM signal would interfere with his “fringe coverage” which was in ANOTHER STATE! These types of complaints by commercial broadcasters should continue to be laughed away by the FCC.

Third...though I would have no objection to allowing LPFM’s who wished to convert to commercial operation to do so, at the very least, I want to see some clarity with underwriting rules. NPR and PBS should not be allowed to “get away” with underwriting infractions that bring big fines to LPFM stations. Both are NCE licenses as of now and the rules should apply equally to all.

Lastly: An LPFM should be allowed to promote events sponsored by nonprofit entities

within their local communities. It is ridiculous to suggest that the mention of the local high school's Dare program's car wash is something which should not be mentioned on an LPFM.

Some in the LPFM community feel these stations should all emulate college radio stations of the past. If a community wishes this type of station, it should have it. On the other hand, if an LPFM can operate successfully using a standard, if somewhat eclectic and diverse, musical format, that, too should be considered as local radio. Stations I am involved in are programming to 35 to 65 year old adults, with a bent toward the upper demographic. This has been proven to be an audience commercial stations have abandoned. This group, too needs and deserves a voice in the community, especially considering the fact that advertisers will not support this audience on commercial stations. The stations I am working with all do local news in one form or another, do "mornings with the mayor" programs, promote local schools and school sports, and civic events. These formats attract listeners, supporters and businesses and can help galvanize support in the local community for such stations.

This is the true spirit of LPFM. And attention to these suggestions and others which may also make sense can ensure that these stations can financially survive and be a local voice that truly operates to the public interest, convenience and necessity.

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<p>250 Watts would only possibly increase my coverage by 10%. Personally I would like to see 500 watts as a Max. and 100 watts as a Min. for LPFM. I agree that (REC's) petition has holes in it and should be fixed. Especially for those in circumstances that they can't increase their power and could possibly choose the very expensive option of boosters.</p> <p>I am ambivalent about allowing full commercials on LPFM. If full commercials were allowed they should be very limited. I remember way back when. I had to struggle to get 9 spots in before the next song. Three spots, time, three spots, temperature, three spots, upcoming song plug, then three more spots. Don't ever want to see or hear that again! Something I think we can agree on is eliminating those arcane and arbitrary regulations about "call to action", "quality", "pricing" or second party fund raising. Even the FCC Chairman wrote a Rulemaking Proposal to eliminate the current second party fund raising rule. As it stands right now, a strict interpretation of that rule doesn't allow a "Community Calendar" type program where the local</p>	

<p>Methodist Church has a pancake breakfast. That couldn't be mentioned or the Lyons Club is having a canned goods drive. A quick story: Sometime ago, my doctor suggested during a yearly checkup to get a Calcium Heart CT scan. He said that the local hospitals offer that from time to time. While walking by the TV that had the local news on, they had an interview about one of the hospitals having the Calcium Heart Scan drive. I had imagined that it would cost around \$300 or \$400. During the TV interview they stated that the cost is only \$50. I immediately made appointments for my wife and myself. Pricing is a vital piece of information. Without knowing the price, I would not have considered making the appointments.</p> <p>As you know the LPFM rules were put in by the NAB and NPR to kill the idea of low power FM. It's all about ratings and market share! Even the NPR stations subscribe to the ratings game, since their underwriting rates are dependent on them. They don't care one wit about the serving the local community. They are only interested in maintaining their monopolies. About 5 years ago, I participated in an Arbitron survey. I put down listening to the NPR station since that is the only station around here that I can tolerate. A few weeks later, I got a letter from the NPR station thanking me. Ratings mean everything to them.</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>KOAV-LP, Canon City, CO <i>Received From: Russ Johnson</i></p> <p><i>Date Received: April 24, 2015</i></p>
<p>My comments there might be a little vague, so as far as limited commercialization, I'd define it as 4 minutes/hour. Arbitrary, yes, but my opinion is that unlimited commercialization would take us down the path to becoming class A1 commercial stations, the NAB contingent might argue, and along with all the rewards, such as protected status, an A1 class should be subject to the same regs, auctioning of channels, etc.</p> <p>Perhaps then there should be two classes of LPFM, one that is non-profit, class D but with 4 min./hr ads and another that is for-profit and with the 500 or 1000 watt max. at 100 meters HAAT which would be designated class A1, and would only be available to areas where no class A allotments are possible.</p> <p>If there was limited commercialization, I would definitely have considered financing the equipment costs of building my LPFM. I tried but ultimately failed to bring on another interested local person to help in</p>	

<p>this quest as far as fundraising is concerned. On a disability income, I have to choose between setting aside a little money for daughter's college fund (won't even come close to paying her whole way) or putting money into an LPFM with limited ability to service debt. I'd have no problem subsidizing the operation with \$25 or \$50 a month, but the whole nut is just too big.</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>WEAK-LP, Athens, OH <i>Received From: Richard Whitmore</i></p> <p><i>Date Received: April 24, 2015</i></p>
<p>I'm pretty much OK with the rules as they are since they are not too hard on us, but more wattage (250 or 500 watts) and some relaxed rules on underwriting messages would be nice!</p>	

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<p>I would like the rules for underwriting changed and I'm with you on the fines.. lower fines.</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>WRZA-LP, Sugarloaf, FL <i>Received From: Ebenson Michelin</i></p> <p><i>Date Received: May 6, 2015</i></p>
<p>I am Ebenson Michelin, and I represent WRZA. I support the LICENSEE BASED Petition for Rulemaking at the FCC because it is unfair that Low Power non-commercial, non-profit, and community-based stations are regulated by the same rules and are eventually subject to the same punishment as the commercial full-power stations.</p> <p>If a decision were to be made my request is that they reduce the penalty for the LPFM and give them more room to operate, provided that they can prove that they are community-based.</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>WRBG-LP, Millsboro, DE <i>Received From: Joseph D'Alessandro</i></p> <p><i>Date Received: May 6, 2015</i></p>
<p>Yes, I agree.</p> <p>Donations are down due to economy. In addition, (our) poor signal (is) not enough power.</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>KUPR-LP, Placitas, NM <i>Received From: Chris Frye</i></p> <p><i>Date Received: May 6, 2015</i></p>
<p>These are comments from KUPR-LP Placitas, NM on relevant FCC rule making.</p> <p>1 - Commercials/Further Enhanced Underwriting - Our station serves about 10,000 potential listeners in rural New Mexico. Relaxation of current rules for LPFM sponsorship/commercials would greatly improve our chances of not going bankrupt, and continuing to help keep our community be safer. With a small base of local businesses, being able to air commercials, consistent with LPTV stations, is critical for us small stations to stay on the air.</p> <p>2 - Primary Status for all LPFMs - We support enhanced secondary service status for LPFM stations, so we have a better chance of staying on the air when faced with a primary status station challenge for our frequency.</p> <p>3 - Reduced/ fair fines for LPFM. Please consider basing fines for LPFM stations on the population covered by their 60 dBu coverage areas. Fine to fit the magnitude of the crime - smaller fines for smaller human impacts of rule violations. If this method of overlaying</p>	

the 60 dBu contour over the Census population map is too complex, at least reduce fines as a class, based on transmitter power output, as compared to full-power stations.

Thank you,

Chris Frye, Station Manager

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>WBED-LP, Bedford, IN <i>Received From: Mike Shannon</i></p> <p><i>Date Received: May 6, 2015</i></p>
<p>We were fortunate to get a higher output power (than many) of just under 90 watts after antenna/loss, but with that, building penetration is far from good. We are in the limestone capital of the world and a large majority of buildings are made of this material (including the one our antenna is on).</p> <p>Add in the very hilly terrain and now we fade in and out on car radios based on how low the dip goes into the pockets of limestone that make up the many hills on the sides of our major highways. These hills/signal killers can be 30-40 feet high. Even in our 60 dbU we flutter and chop. In some buildings I can see our antenna but the radio will not pick us up within 1 mile of the antenna site. We have been on for just over 6 months and the biggest complaint is our weak signal. We have a good clean and almost CD quality signal when you are in the right place. We must be doing something right. The AM/FM combo (the only other local stations) are</p>	

<p>doing everything they can to stop us/blacklist us.</p> <p>The bottom line, I do believe a power upgrade would help, and anything else in your proposal would be a plus.</p> <p>Also I would like to see LPFMs be able to microwave or feed audio via net to a co-owned translator. (Why we are saddled with over the air reception limitations when our power is so weak I will never understand.)</p>	
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<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>KFXM-LP, Lancaster, CA <i>Received From: Joel Zeeve</i></p> <p><i>Date Received: May 6, 2015</i></p>
<p>I have been the Chairman of a LPFM station for over 10 years. I see the proposed changes as the light at the end of the tunnel. I have on many occasions have written checks from my personal accounts to keep the station on the air.</p> <p>We have applied for many Financial Grants over the years to no avail. Unfortunately LPFM to many Grant Foundations, is non existent on their radar. However the station continues to hit the bull's-eye with audience, Senior Citizens age 50 -85, who if not for this LPFM, would have no station broadcasting anything relevant to them. Currently less than 1% of all over the air broadcast stations target their programming to older Americans.</p> <p>Please consider the changes to the LPFM service and please give a thumbs up.</p> <p>Thank you,</p> <p>Joel M. Zeeve, Chairman KFXM- LP</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>KRWS-LP, Hardin. MT <i>Received From: Al Sargent</i></p> <p><i>Date Received: May 7, 2015</i></p>
<p>Low power FM radio stations have been charged with informing our audiences with vital information concerning weather and local issues important to the welfare of our listeners but have not been provided an adequate means to support providing that vital information. The 13 watts at KRWS-FM in the middle of the Crow and Cheyenne Indian reservation in Montana is the only source of local information but yet we must struggle to pay the power bill because some conglomerate fears we will put them out of business if we are allowed to sell commercial advertising which would help pay the power bill. If our 13 watts is that big a threat to the high power commercial stations they are not capable of competing in the first place. LPFM radio stations provide a valuable service and should be allowed to sell commercial advertising if they are going to be required to provide the important information they have been charged with providing.</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>WKUF-LP, Flint, MI <i>Received From: Brandon Dombrowski</i></p> <p><i>Date Received: May 8, 2015</i></p>
<p>WKUF would like to add its name to the pool of LPFMs speaking up about the need for change in FCC regulations.</p> <p>As a student-run college radio station, funding for equipment repairs and upgrades is always in short supply. Even small concessions regarding how we can advertise would make a tremendous impact on the state of WKUF's equipment.</p> <p>Best Regards,</p> <p>Brandon Dombrowski Station Manager</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>KRIM-LP, Payson, AZ <i>Received From: Chris Higgins</i></p> <p><i>Date Received: May 10, 2015</i></p>
<p>To Whom it May Concern,</p> <p>My name is Chris Higgins and I am part owner of KRIM 96.3FM-LP. We are located in Payson, AZ and have been broadcasting for 13 years. The benefit of loosening FCC restrictions on LPFM stations would ultimately benefit the communities in which we are located, since we fill such a vital role in the community. Stronger community radio stations equal stronger communities.</p> <p>Thank you,</p> <p>Chris Higgins</p> <p>KRIM 96.3FM-LP</p> <p>Payson, AZ 85541</p>	

<p>OFFICIAL COMMENTS and STATEMENT OF FACT REGARDING OPERATING AN LPFM RADIO STATION UNDER THE CURRENT RULES IN MY TOWN</p> <p><i>-As a documentation of our station's voice and an important part of the LPFM-AG Petition For Rulemaking - our station declares:</i></p>	<p>KPUP-LP, Paragonia, AZ <i>Received From: Bob Ollerton</i></p> <p><i>Date Received: May 13, 2015</i></p>
<p>We are the only radio station that can be reliably heard in our community. We are barred from serving all the English speaking people in our border area due to the punitive restrictions on power enforced by the stupid radio treaty with Mexico. Funding is difficult due to the small audience we reach. These problems could be reduced if allowed to play commercial messages, reasonable licensing for LPFM translators, and the waiver of the stupid treaty to protect high powered radio in Mexico.</p>	

APPENDIX B: LPFM.AUDIO MEMBER STATIONS

This is a list of FCC licensed LPFM radio stations who are active members in <http://LPFM.Audio> as of June 11, 2015.

Please Note: Many of our member stations are participants and supporters, but not all of them. We'd like to clarify, for the record, that, just because a licensed LPFM station is on this list does not mean the licensee supports this petition. That said, please do not assume the licensed LPFM member stations are *all* on board. Please just assume that *most* of them are.

KBRP-LP, Bisbee, AZ
KCMJ-LP, Colorado Springs, CO
KEBF-LP, Morro Bay, CA
KEWZ-LP, West Monroe, LA
KFTW-LP, Fort Worth, TX
KFUR-LP, St George, UT
KFXM-LP, Lancaster, CA
KGCE-LP, Modesto, CA
KHEL-LP, Rogers, AR
KHOA, Hope, AR
KHPP-LP, Sterlington, LA
KKLQ, La Quinta, CA
KKRM-LP, Montevideo, MN
KLEK-LP, Jonesboro, AR
KLXL-LP, Fort Garland, CO
KMGG-LP, Albuquerque, NM
KOAV-LP, Canon City, CO
KOCZ-LP, Opelousas, LA
KOKT-LP, Tulsa, OK
KPYT-LP, Tucson, AZ
KRWS-LP, Hardin, MT
KTDT-LP, Tucson, AZ
KTSQ-LP, Purley-Mount Vernon, TX
KTWI-LP, Liberal, KS
KUPR-LP, Placitas, NM
KVPB-LP, Vernonia, OR
KVWO-LP, Welch, OK
KXTJ-LP, San Antonio, TX

KWKI-LP, Pahrump, NV
WACF-LP, Brookfield, MA
WALH-LP, Wilmington, OH
WBED-LP, Bedford IN
WBLN-LP, Glens Falls, NY
WBPL-LP, Wilmington, NC
WBPS-LP, Cambridge, OH
WCOM-LP, Chapel Hill, NC
WCNX-LP, Covington, KY/Cincinnati, OH
WDFC-LP, Greensboro, NC
WDMZ-LP, Benton, KY
WDXD-LP, Tallahassee, FL
WDZD-LP, Monroe/Charlotte, NC
WEAK-LP, Athens, OH
WEHB-LP, Wadesboro, NC
WEPB-LP, Noblesville, IN
WEZG-LP, Greenville, SC
WFBS-LP, Salem, SC
WFEL-LP, Antioch, IL
WFHA-LP, Melbourne, FL
WFOG-LP, Galax, VA
WHEZ-LP, Hartsville, SC
WHOA-LP, Raleigh, NC
WHJU-LP, Conyers, GA
WHYU-LP, Elk Lick, PA
WIXL-LP, Madison, WI
WJFN-LP, Philadelphia, PA
WJRP-LP, Calhoun, GA
WJSK-LP, Bartlett, NH
WLIX-LP, Ridge, NY
WLLO-LP, Londonderry NH
WLPP-LP, Palenville, NY
WLXY-LP, Chelsea, AL
WMEX-LP, Rochester, NH
WMRW-LP, Warren, VT
WMXP-LP, Greenville, SC
WMYU-LP, Ooltewah, TN
WNPA-LP, Canton, OH
WOHP-LP, Huntsville, OH

WPCA-LP, Amery, WI
WPCG-LP, Canton, GA
WPFA-LP, Winter Park/Orlando, FL
WQJJ-LP, Jasper, AL
WQMR-LP, Rocky Mount, VA
WQTP-LP, Columbus, MO
WRKD-LP, Rockford, OH
WRMV-LP, Madison Heights, VA
WRPO-LP, Russells Point, OH
WRFN-LP, Pasquo/Nashville, TN
WRKE-LP, Salem, VA
WRLY-LP, Raleigh, NC
WRZA-LP, Sugarloaf/Key West, FL
WSLR-LP, Sarasota, FL
WSWE-LP, Sweet Briar, VA
WSWO-LP, Huber Heights/Dayton, OH
WTIJ-LP, Bryson City, NC
WTND-LP, Macomb, IL
WTZO-LP, Thomasville, NC
WUOH-LP, Orlando, FL
WUCG-LP, Blairsville, GA
WUCR-LP, Lake Butler, FL
WUUK-LP, Canadohta Lake, PA
WUVS-LP, Muskegon, MI
WVGT-LP, Mount Dora, FL
WVHO-LP, Nanticoke, PA
WWRT-LP, Conway/Orlando, FL
WWWR-LP, Wadsworth, OH
WXED-LP, Ellwood City, PA
WXFC-LP, Blue Ridge, GA
WXXR-LP, Terre Haute, IN
WYLA-LP, Charleston, SC
WYML-LP, Ingleside, IL
WYPH-LP, Manchester, CT
WYRC-LP, Spencer, WI
WYRZ-LP, Brownsburg, IN
WZFN-LP, Sandy Springs, SC
WZPH-LP, Dade City, FL
WZRF-LP, Wilmington, NC

APPENDIX C: CANCELLED LPFM CPS AND LICENSES

Who is the beneficiary to such a workload, taxpayer investment & eventual loss of LPFM service once an approved LPFM station is sent back to the commission?. So much of the FCCs resources seem devoted to the process.

It's certainly not the American people.

*Here is the most recent list (as of June 2015) of **Cancelled/Deleted LPFM**s. Stations are listed next to the American city/town that lost service when the LPFM radio station was removed from their dials.*

Its time to save a service that was important enough to create. LPFM can save local economies, protect local citizens and function in all the ways traditional local radio did prior to 1992.

Further, LPFM is the secret to AM revitalization. AM owners are losing everything by simply trying to serve their communities. They should have access to an equal distribution methods for their locally based programming that is effective. FM radio is the only answer and LPFM owns all the real estate. LPFM stations should be able to (LMA) their stations to AM radio stations if both parties are willing.

When both services cooperate, American small town economies win.

Deleted LPFM Stations: Since 2000

DWACM-LP	94.3	Auburn Chinese Ministry Assoc.	Auburn AL	(CANCELLED LICENSE - 12/5/2011)
	94.7	Better Education Communications	Scottsboro AL	EXPIRED CP
DWFAN-LP	97.9	Huntsville Chinese Ministry Assoc.	Huntsville AL	(CANCELLED CP - 10/12/2007)
	98.1	Decatur Educational Assoc.	Decatur AL	(CANCELLED CP - 10/12/2007)
DWJWC-LP	101.9	Gallion Urban Broadcast Assoc.	Gallion AL	(CANCELLED LICENSE - 11/17/2011)
DWKOC-LP	103.1	Ider Educational Broadcasting	Ider AL	(CANCELLED LICENSE - 12/2/2011)
WLHQ-LP	103.1	South Alabama Public Service Broadcasters	Jackson AL	EXPIRED CP
DWUAC-LP	103.3	Crucifest Ministries	Tuscaloosa AL	(CANCELLED LICENSE - 12/16/2014)
DWTCC-LP	103.3	Tuscaloosa Chinese Ministry Assoc.	Tuscaloosa AL	(CANCELLED CP - 10/12/2007)
	103.9	North Sand Mountain Broadcasting Co.	Bryant AL	EXPIRED CP
DWXMT-LP	105.5	Oak Mountain Community Radio Inc.	Pelham AL	(CANCELLED CP - 1/22/2004)

	88.1	Native Village Of Savoonga	Savoonga AK	(CANCELLED CP - 12/17/2002)
DKAQU-LP	88.1	City & Borough Of Sitka	Sitka AK	(CANCELLED LICENS 10/22/2013)
DKAMP-LP	92.9	Anthony A. Andrews School	St. Michael AK	(CANCELLED LICENS 4/20/2009)
DKONR-LP	104.9	Organization For Northern Development d/b/a Out North	Anchorage AK	(CANCELLED LICENS 2/5/2014)
	92.1	Cottonwood Educational Assoc.	Cottonwood AZ	(CANCELLED CP - 2/5/2004)
DKYXS-LP	94.3	Coyote Radio	Prescott AZ	(CANCELLED CP - 4/4/2008)
DKZXS-LP	94.3	Prescott Community Access Channel Inc.	Prescott AZ	(CANCELLED CP - 4/4/2008)
DKWPS-LP	95.7	EQ Scholars Inc.	Ehrenberg AZ	(CANCELLED LICENS - 5/8/2007)
	98.7	Kingman Missionary Alliance Church	Kingman AZ	EXPIRED CP
DKJBE-LP	100.5	Truth & Life Ministries	Lakeside AZ	(CANCELLED LICENS - 2/13/2008)
	100.7	New Dimensions Broadcasting Inc.	Tucson AZ	EXPIRED CP
	100.9	Avra Valley Community Resources Committee	Marana AZ	EXPIRED CP
DKBWV-LP	101.5	The Path Inc.	Bacavi AZ	(CANCELLED LICENS - 10/18/2010)
KOKD-LP	105.7	Christian Fellowship Ministries, A Non-Profit Corp.	Tonopah AZ	EXPIRED CP
DKAGR-LP	94.5	Christian Fellowship Church	Searcy AR	(CANCELLED CP - 5/2/2005)
DKSHJ-LP	96.5	St. Michael Educational Assoc.	Conway AR	(CANCELLED CP - 7/7/2005)

DKPJN-LP	101.1	St. Therese Missionary Society	Marshall AR	(CANCELLED LICENSE - 2/1/2012)
DKHFN-LP	101.9	Holy Family Educational Assoc. Of Sebastian City AR	Ft. Smith AR	(CANCELLED CP - 9/7/2004)
	92.3	The Allensworth Progressive Assoc.	Allensworth CA	(CANCELLED CP - 11/3/2005)
DKCVE-LP	92.3	Calvary Chapel Of Ventura	Ventura CA	(CANCELLED LICENSE - 5/26/2009)
KGRL-LP	93.1	Three Angels Educational Broadcasting Inc.	Gridley CA	EXPIRED CP
	93.3	Calvary Chapel Of Marysville	Marysville CA	EXPIRED CP
	93.7	Calvary Chapel Of Imperial Valley Inc.	El Centro CA	(CANCELLED CP - 12/16/2002)
DKFSC-LP	94.1	Friends Of Radio Grito / Proyecto Campesino	Visalia CA	(CANCELLED LICENSE - 12/1/2013)
KQOF-LP	94.1	Pacific Friends Outreach Society	Visalia CA	EXPIRED CP
	95.1	Calvary Chapel Grass Valley	Grass Valley CA	(CANCELLED CP - 1/7/2005)
	95.7	First Baptist Church - Stockton	Stockton CA	(CANCELLED CP - 2/22/2005)
DKCWS-LP	95.9	Christian Worship Center	Manteca CA	(CANCELLED CP - 2/21/2003)
DKVRY-LP	96.3	Calvary Chapel Of Santa Barbara	Goleta CA	(CANCELLED LICENSE - 12/1/2013)
DKJSM-LP	97.1	Joshua Springs Calvary Chapel	Yucca Valley CA	(CANCELLED LICENSE - 8/6/2013)
	98.1	The Lawyers Second Amendment Society Inc.	Porterville CA	(CANCELLED CP - 1/9/2003)
DKKJD-LP	99.1	Borrego Springs Christian Center	Borrego Springs CA	(CANCELLED LICENSE - 7/12/2013)

	99.1	Friendships Unlimited	Port Hueneme CA	EXPIRED CP
DKWVS-LP	101.5	Pepperdine University	Malibu CA	(CANCELLED LICENSE - 8/26/2013)
	102.3	Calvary Chapel North Edwards	North Edwards CA	(CANCELLED CP - 1/9/2003)
	102.7	San Simeon Chamber Of Commerce	San Simeon CA	EXPIRED CP
DKGEK-LP	103.3	Glen Ellen Fire Protection District	Glen Ellen CA	(CANCELLED CP - 4/24/2008)
DKJBQ-LP	103.3	Mountain Empire Community Broadcasting Inc.	Potrero CA	(CANCELLED CP - 10/10/2002)
DKSOJ-LP	103.5	Calvary Chapel Of The Pass	Banning CA	(CANCELLED LICENSE - 8/23/2013)
DKWLK-LP	103.7	Calvary Chapel Fellowship Of Valley Springs	Valley Springs CA	(CANCELLED LICENSE - 2/21/2013)
	103.9	Roberts Liardon Ministries Inc. / Spirit Lake Bible College	Irvine CA	(CANCELLED CP - 9/16/2008)
	104.1	Setec Astronomy Club Inc.	San Clemente CA	(CANCELLED CP - 1/9/2003)
DKWMI-LP	104.1	Weimar Institute Inc.	Weimar CA	(CANCELLED LICENSE - 10/18/2010)
DKUVC-LP	104.3	Ukiah Community Radio	Ukiah CA	(CANCELLED CP - 3/20/2008)
DKFCA-LP	104.5	Hmong American Community Inc.	Fresno CA	(CANCELLED LICENSE - 2/28/2008)
DKPFZ-LP	104.5	Lake County Community Radio	Lucerne CA	(CANCELLED LICENSE - 4/28/2008)
DKCFM-LP	105.5	Charisma In Missions Inc - San Bernadino	San Bernardino CA	(CANCELLED CP - 6/2/2009)

DKPLS-LP	105.7	Radio Education Associates	Chico CA	(CANCELLED CP - 3/2/2004)
DKQSL-LP	105.7	One Ministries Inc.	Penngrove CA	(CANCELLED CP - 12/5/2007)
DKPCA-LP	105.7	Petaluma Community Access	Petaluma CA	(CANCELLED CP - 12/5/2007)
DKRPC-LP	105.7	Sonoma State University	Rohnert Park CA	(CANCELLED CP - 10/15/2007)
DKEQP-LP	106.9	Calvary Chapel Of Modesto Inc.	Modesto CA	(CANCELLED LICENSE - 10/5/2012)
	106.9	Calvary Temple Assembly Of God Of Modesto	Modesto CA	EXPIRED CP
DKFOJ-LP	107.3	Mendocino Presbyterian Church	Mendocino CA	(CANCELLED CP - 2/1/2008)
DKZED-LP	107.5	LaGrange Historical Assoc. Inc.	LaGrange CA	(CANCELLED LICENSE - 12/1/2013)
DKJOB-LP	107.5	San Diego County SER/Jobs For Progress Inc.	San Diego CA	(CANCELLED CP - 2/18/2007)
	93.5	Basalt High School	Basalt CO	(CANCELLED CP - 8/30/2005)
	97.5	South East Colorado Living Springs	Lamar CO	(CANCELLED CP - 10/14/2003)
DKKDH-LP	100.7	Rocky Mountain Public Service Broadcasters	Eagles Nest CO	(CANCELLED CP - 2/28/2007)
KKNZ-LP	101.5	Fireside Educational Group	Fort Collins CO	EXPIRED CP
	101.5	Victorious Living Radio	Grand Junction CO	(CANCELLED CP - 10/20/2003)
DKAMV-LP	101.9	Alianza Ministerial Vision Milenial	Brighton CO	(CANCELLED LICENSE - 4/1/2013)

DKKWC-LP	102.3	Rocky Mountain Radio Corp.	Wheat Ridge CO	(CANCELLED CP - 9/25/2006)
DKCQX-LP	106.9	Cuchara Community Broadcast Assoc.	Cuchara CO	(CANCELLED LICENSE - 12/4/2012)
	95.3	Sanford School	Hockessin DE	(CANCELLED C 4/10/2015)
DWGRV-LP	93.1	Brevard Youth Education Broadcasting Corp.	Melbourne FL	(CANCELLED LICENSE - 6/24/2014)
DWZRO-LP	93.1	Suwannee River Fishing Assoc.	Suwannee FL	(CANCELLED LICENSE - 2/2/2012)
DWRGI-LP	93.7	Gasparilla Island Community Radio Coalition	Boca Grande FL	(CANCELLED CP - 3/26/2004)
DWKOF-LP	93.7	City Of Kissimmee	Kissimmee FL	(CANCELLED CP - 1/17/2008)
DWSEU-LP	96.1	Southeastern University Inc.	Auburndale FL	(CANCELLED CP - 4/24/2008)
DWLAS-LP	96.1	Ridge Area Radio Support Group Inc.	Bartow FL	(CANCELLED LICENSE - 2/3/2012)
DWPZL-LP	96.3	New Hope M.B. Church	Anthony FL	(CANCELLED LICENSE - 6/14/2005)
DWQRD-LP	96.5	Calvary Chapel Of Brandon Inc.	Gibsonton FL	(CANCELLED LICENSE - 7/12/2010)
DWFBO-LP	97.7	Halifax Christian Community Church Inc.	Flagler Beach FL	(CANCELLED LICENSE - 5/7/2009)
DWKJO-LP	99.1	Brooksville Public Radio Inc.	Brooksville FL	(CANCELLED CP - 2/5/2004)
	99.9	First Baptist Church Of Steinhatchee	Steinhatchee FL	EXPIRED CP
DWWWP-LP	99.9	Wauchula Educational Broadcasting Corp.	Wauchula FL	(CANCELLED CP - 1/22/2010)

DWJND-LP	100.5	Vernon High School	Vernon FL	EXPIRED CP
	100.7	Primeria Inglesia Bautista Hispanic Assoc.	Ocala FL	(CANCELLED CP - 7/2/2010)
DWCQQ-LP	101.1	Calvary Emerald Coast Inc.	Destin FL	(CANCELLED LICENSE - 8/22/2008)
	101.1	Bartram Trail High School	St. Augustine FL	EXPIRED CP
DWKJO-LP	102.7	Landmark Baptist Church	Brooksville FL	(CANCELLED LICENSE - 10/31/2011)
DWVLG-LP	103.3	The Villages Chamber Of Commerce Inc.	The Villages FL	(CANCELLED LICENSE - 8/27/2009)
	104.3	Chipley High School	Chipley FL	(CANCELLED CP - 6/17/2004)
	104.3	The Barnacle Society Inc.	Florida City FL	EXPIRED CP
	104.3	Everglades Community Assoc. Inc.	Florida City FL	EXPIRED CP
DWWLJ-LP	104.5	Grace United Methodist Church	Marianna FL	(CANCELLED CP - 3/4/2004)
DWBFT-LP	105.5	Brevard County Board Of County Commissioners	Micco FL	(CANCELLED LICENSE - 9/28/2010)
	105.9	Port St. Lucie Bible Church Inc.	Port St. Lucie FL	(CANCELLED CP - 8/25/2005)
DWRPL-LP	106.9	Radio Club Culturel	Ft. Lauderdale FL	(CANCELLED CP - 12/12/2003)
DWTHA-LP	107.1	Seaside School Inc.	Seaside FL	(CANCELLED LICENSE - 2/12/2015)
DWCTA-LP	107.1	Victory Of Faith Fellowship	Southport FL	(CANCELLED LICENSE - 4/6/2007)
	107.5	First Baptist Church Of Pine Island	Bokeelia FL	EXPIRED CP
	107.9	Radio Resplandece	Lehigh Acres FL	(CANCELLED CP - 9/1/2009)

	107.9	Iglesia De Cristo Elim De Naples	Naples FL	(CANCELLED CP - 9/1/2009)
DWNRG-LP	107.9	Public Radio Information Services Of Central Florida Inc.	Palm Bay FL	(CANCELLED LICENSE - 1/27/2014)
	92.5	Georgia Department Of Transportation	Tallapoosa GA	(CANCELLED CP - 12/20/2002)
DWGDY-LP	93.3	Athenstown Media Enthusiasts Assoc.	Athens GA	(CANCELLED CP - 2/2/2006)
	93.3	Free Chapel Worship Center Inc.	Gainesville GA	(CANCELLED CP - 10/29/2004)
DWGGR-LP	95.3	Talk Of Your Life Radio	Carrollton GA	(CANCELLED LICENS - 10/22/2014)
	96.5	South Georgia Hispanic Ministries	Douglas GA	(CANCELLED CP - 12/19/2002)
	97.1	Georgia Department Of Transportation	Louise GA	(CANCELLED CP - 12/20/2002)
DWCRU-LP	97.1	Thomaston Christian Radio	Thomaston GA	(CANCELLED LICENS - 6/24/2005)
DWRMH-LP	98.9	LaGrange Christian Radio	LaGrange GA	(CANCELLED LICENS - 12/13/2011)
DWFNG-LP	100.5	Frogtown Community Radio Inc.	Frogtown GA	(CANCELLED LICENS - 12/30/2011)
	102.7	Sunrise Broadcasting Corp.	Moultrie GA	EXPIRED CP
DWQOC-LP	103.3	M&D Christian Educational Media Inc.	Colquitt GA	(CANCELLED CP - 1/10/2003)
DWFVS-LP	104.3	The Broadcasters Club	Fort Valley GA	(CANCELLED LICENS - 12/29/2014)
	105.3	Georgia Department Of Transportation	Lavonia GA	(CANCELLED CP - 12/12/2002)
DWSGV-LP	105.7	Cross Communications	Guyton GA	(CANCELLED LICENS - 2/25/2011)

DWHLE-LP	106.3	Fellowship Of Holy Hip Hop Inc.	Atlanta GA	(CANCELLED LICENS - 12/21/2011)
DWZHB-LP	106.3	Zion Hill Baptist Church & Truth Center Inc.	Douglasville GA	(CANCELLED LICENS - 12/2/2011)
DKEAO-LP	91.5	Mana'o Radio	Wailuku HI	(CANCELLED LICENSE - 6/25/2013)
	96.9	Kona Seventh-Day Adventist Church	Captain Cook HI	(CANCELLED CP - 10/16/2003)
DKLUI-LP	97.3	King's Voice On The Mountain Radio Assoc.	Kula HI	(CANCELLED LICENSE - 11/5/2013)
	101.1	Calvary Chapel Windward	Kailua HI	(CANCELLED CP - 8/16/2007)
	101.1	Kapaa Seventh-Day Adventist Church	Kapaa HI	(CANCELLED CP - 10/16/2003)
	101.1	North Shore Radio Co-Op	Waialua HI	EXPIRED CP
	101.1	Institute For The Advancement Of Hawaiian Affairs	Wai'Anae HI	EXPIRED CP
DKCOF-LP	101.1	Wai'Anae Coast Coalition	Wai'Anae HI	EXPIRED CP
	101.1	Wai'Anae Coast Community Mental Health Center	Wai'Anae HI	EXPIRED CP
	102.5	Kona Info Inc.	Captain Cook HI	(CANCELLED LICENSE - 2/5/2014)
DKVIB-LP	103.5	Puna Seventh-Day Adventist Church	Keaau HI	(CANCELLED CP - 10/16/2003)
	103.5	Cooper Center Council	Volcano Village HI	(CANCELLED CP - 10/20/2003)
DKJHI-LP	107.3	King's Herald Radio Assoc.	Honokaa HI	(CANCELLED LICENSE - 11/5/2013)
DKRGL-LP	107.9	Honokaa Seventh-Day Adventist Church	Honokaa HI	(CANCELLED CP - 10/16/2003)

DKRFP-LP	92.5	Radio Free Moscow Inc.	Moscow ID	(CANCELLED LICENSE - 11/1/2013)
DKUUS-LP	93.1	Nez Perce Tribe	Lapwai ID	(CANCELLED CP - 2/12/2015)
	97.5	Commissioned By Christ	Twin Falls ID	(CANCELLED CP - 10/16/2003)
	97.7	Sandpoint Low Power Christian Radio	Sandpoint ID	(CANCELLED CP - 5/5/2005)
	106.9	Lake City Lighthouse Inc.	Lake City ID	EXPIRED CP
DWPDQ-LP	93.9	Mt. Carmel Public Broadcasting	Mt. Carmel IL	(CANCELLED LICENSE 4/25/2013)
DWPKC-LP	95.5	Southern Illinois Educational Low Power Radio Assoc. Inc.	West Frankfort IL	(CANCELLED LICENSE 3/15/2007)
DWEAH-LP	95.9	iWorship Center	Springfield IL	(CANCELLED CP - 1/31/2008)
WWGD-LP	95.9	Abundant Family Life Center	Springfield IL	EXPIRED CP
WFJL-LP	95.9	Insight Ministries Inc.	Springfield IL	EXPIRED CP
	98.3	Calvary Fellowship Of McHenry	McHenry IL	(CANCELLED CP - 2/21/2003)
	101.5	Grant Park CUSD #6	Grant Park IL	(CANCELLED CP - 5/2/2003)
WCUA-LP	101.9	Peoria Chinese Ministry Assoc.	Peoria IL	(silent +)
DWEUR-LP	103.1	Eureka College	Eureka IL	(CANCELLED CP - 2/21/2003)
DWJHP-LP	103.3	Cross Roads Family Broadcasting	Carmi IL	(CANCELLED LICENSE 2/13/2013)
	106.5	Athens Broadcasting Foundation	Athens IL	(CANCELLED CP - 2/28/2003)
	92.3	Floyd Central High School PTO	Floyd Knobs IN	(CANCELLED CP - 7/23/2014)

DWVRG-LP	93.9	Calvary Chapel Of Crawfordsville Inc.	Crawfordsville IN	(CANCELLED LICENSE 1/16/2014)
DKCES-LP	92.9	Iowa Department Of Transportation	Osceola IA	(CANCELLED CP - 2/5/2004)
DKTMA-LP	92.9	Iowa Department Of Transportation	Tama IA	(CANCELLED CP - 2/5/2004)
	93.1	Shellsburg Community Broadcasting Assoc.	Shellsburg IA	EXPIRED CP
	93.5	Iowa Department Of Transportation	Ottumwa IA	(CANCELLED CP - 2/22/2005)
DKGVC-LP	94.1	Grand View College	Des Moines IA	(CANCELLED LICENSE - 3/13/2015)
DKOLH-LP	94.1	St. Anthony's Educational Radio Assoc.	Indianola IA	(CANCELLED CP - 9/11/2007)
DKPBC-LP	94.1	Pleasantville Baptist Church	Pleasantville IA	(CANCELLED LICENSE - 7/28/2011)
DKTUA-LP	94.1	Iowa Department Of Transportation	Stuart IA	(CANCELLED CP - 5/31/2005)
	94.7	Mason City Educational Assoc.	Mason City IA	(CANCELLED CP - 2/27/2004)
	94.7	St. Philomena Educational Radio Assoc.	Waverly IA	(CANCELLED CP - 2/27/2004)
DKAHW-LP	95.1	Iowa Department Of Transportation	Loveland IA	(CANCELLED CP - 7/30/2003)
DKWFF-LP	95.3	Winds Of Fire Ministries	Pocahontas IA	(CANCELLED LICENSE - 2/13/2013)
DKGCW-LP	95.7	Mercy Of Jesus Educational Radio Assoc.	Johnston IA	(CANCELLED LICENSE - 8/12/2010)
DKAHX-LP	96.7	Iowa Department Of Transportation	Marquette IA	(CANCELLED CP - 2/5/2004)

	96.7	Waukon Educational Assoc.	Waukon IA	(CANCELLED CP - 2/27/2004)
DKCVA-LP	96.9	Cedar Valley Music Authority Inc.	Cedar Falls IA	(CANCELLED CP - 2/17/2004)
	96.9	Waverly Light & Power	Waverly IA	(CANCELLED CP - 3/26/2004)
DKDOU-LP	97.5	Iowa Department Of Transportation	Sibley IA	(CANCELLED CP - 2/5/2004)
DKOUP-LP	98.5	Iowa Department Of Transportation	Mt. Pleasant IA	(CANCELLED CP - 2/5/2004)
	99.1	Faith Assoc.	Denison IA	(CANCELLED CP - 7/29/2002)
DKRAA-LP	99.5	Iowa Department Of Transportation	Prairie City IA	(CANCELLED CP - 5/31/2005)
DKLLE-LP	102.5	Iowa Department Of Transportation	Neola IA	(CANCELLED CP - 5/31/2005)
DKVCA-LP	102.9	Iowa Department Of Transportation	Avoca IA	(CANCELLED CP - 2/5/2004)
DKVAA-LP	103.1	Iowa Department Of Transportation	Villisca IA	(CANCELLED CP - 5/31/2005)
DKWCJ-LP	103.3	Webster City Educational Assoc.	Webster City IA	(CANCELLED CP - 2/27/2004)
DKAHT-LP	104.7	Iowa Department Of Transportation	Thayer IA	(CANCELLED CP - 2/5/2004)
DKPIO-LP	99.3	Knights Of Columbus Council #7422 Educational Committee Inc.	Lyons KS	(CANCELLED CP - 2/28/2003)
DKVPC-LP	100.5	First Presbyterian Church Of Dodge City KS	Dodge City KS	(CANCELLED LICENSE - 6/9/2008)
WSOP-LP	93.7	Abundant Life Inc.	Shelbyville KY	EXPIRED CP

DWYAH-LP	93.7	Franklin Avenue Church Of The Living God Inc.	Winchester KY	(CANCELLED LICENSE 12/24/2008)
DWXFR-LP	96.3	Harvey-Brewers Protection Assoc.	Benton KY	(CANCELLED LICENSE 1/9/2015)
	99.9	Calvary Chapel Of Bowling Green Inc.	Bowling Green KY	EXPIRED CP
	100.1	St. James Radio Assoc.	Elizabethtown KY	(CANCELLED CP - 9/3/2004)
	102.7	Resurrection Church	Bowling Green KY	(CANCELLED CP - 9/9/2004)
	107.5	Calvary Chapel Of Lexington Inc.	Lexington KY	(CANCELLED CP - 2/1/2008)
DWBLG-LP	107.9	Meadowland Baptist Church	Bowling Green KY	(CANCELLED LICENSE 2/16/2012)
	94.1	Tri City Community Broadcasting	Morgan LA	(CANCELLED CP - 11/3/2008)
	100.3	Covington High School	Covington LA	(CANCELLED CP - 1/11/2005)
DWRQZ-LP	103.7	Family Radio Broadcasting Inc.	Chalmette LA	(CANCELLED CP - 12/21/2004)
	105.5	GSRI Property Owners Assoc.	Baton Rouge LA	EXPIRED CP
DKEPT-LP	106.1	First Baptist Church Of Mansfield	Mansfield LA	(CANCELLED LICENSE - 2/2/2012)
DWEYM-LP	95.3	St. Matthew's Episcopal Church	Oakland MD	(CANCELLED CP - 12/12/2002)
DWVSJ-LP	99.9	St. John Vianney Roman Catholic Church	Prince Frederick MD	(CANCELLED CP - 2/11/2005)

DWWZZ-LP	100.7	Alternatives For Communities In Crisis Inc.	St. Leonard MD	(CANCELLED CP - 9/11/2007)
DWXLJ-LP	97.7	Cape Cod Christian Broadcasting	East Harwich MA	(CANCELLED LICENSE - 10/18/2010)
	99.7	Citylight Ministry Center	Springfield MA	(CANCELLED CP - 11/17/2006)
	102.9	Fitchburg Group Educational Assoc.	Fitchburg MA	EXPIRED CP
	103.1	Sirius Community	Shutesbury MA	(CANCELLED CP - 9/24/2004)
	105.3	Montague Community Cable Inc.	Montague MA	(CANCELLED CP - 9/2/2008)
DWCAC-LP	92.7	Community Access Center	Kalamazoo MI	(CANCELLED CP - 12/7/2004)
	95.9	Washtenaw Community College	Freedom Twp. MI	EXPIRED CP
DWTRJ-LP	95.9	The Trinity Evangelical Lutheran Church Of Jackson MI	Jackson MI	(CANCELLED CP - 2/13/2003)
DWUBC-LP	97.1	Chapel Hill United Methodist Church	Battle Creek MI	(CANCELLED CP - 1/7/2005)
DWDOW-LP	97.1	Prayer Tower Ministry	Cassopolis MI	(CANCELLED LICENSE - 6/7/2011)
DWQOS-LP	98.9	Children Saving Children Services	Mt. Pleasant MI	(CANCELLED LICENSE - 10/5/2012)
DWMBC-LP	100.9	Maranatha Bible And Missionary Conference	Norton Shores MI	(CANCELLED LICENSE - 6/1/2012)

	101.7	Sunrise Assembly Of God	Rogers City MI	(CANCELLED CP - 5/24/2005)
	104.3	Manistee United Methodist Church	Manistee MI	(CANCELLED CP - 5/2/2003)
	105.5	Wesley Foundation Campus Ministry	Mt. Pleasant MI	EXPIRED CP
DWBSQ-LP	105.9	Breckenridge Community Services	St. Louis MI	(CANCELLED LICENSE - 10/5/2012)
DWRWP-LP	106.7	Rock Ministries	Mt. Pleasant MI	(CANCELLED CP - 12/13/2005)
	106.7	Downtown Development Authority For Village Of Three Oaks	Three Oaks MI	(CANCELLED CP - 3/14/2006)
	106.7	River Valley Ministerial Assoc.	Three Oaks MI	(CANCELLED CP - 3/14/2006)
	106.7	Three Oaks Business Assoc.	Three Oaks MI	(CANCELLED CP - 3/14/2006)
DWRFK-LP	107.7	Mt. Pleasant Christian Academy	Mt. Pleasant MI	(CANCELLED LICENSE - 6/9/2005)
DKSMP-LP	92.3	Assembly Of God Church	Sherburn MN	(CANCELLED CP - 2/14/2003)
	98.5	Caravan Broadcasting Assoc.	Alexandria MN	(CANCELLED CP - 4/15/2003)
	106.1	Esko Senior Citizens	Esko MN	(CANCELLED CP - 3/17/2004)
DKHMN-LP	107.9	Bluff Country Broadcasting	Houston MN	(CANCELLED CP - 6/10/2005)

WTRR-LP	97.1	His Compassionate Touch Human Services Corp.	Glen MS	OFF AIR
DWWCV-LP	100.5	Canton Convention & Visitors Bureau	Canton MS	(CANCELLED LICENSE - 2/1/2012)
	101.3	Morgantown Church Of God	Morgantown MS	EXPIRED CP
DWGWT-LP	103.7	Compass Points Educational Foundation Inc.	Houston MS	(CANCELLED LICENSE - 9/10/2014)
DWKEP-LP	103.9	Keepers Of The Pledge Inc.	Gulfport MS	(CANCELLED CP - 8/2/2005)
DWSNT-LP	103.9	St. Andrew's Episcopal School	Ridgeland MS	(CANCELLED CP - 12/21/2004)
DKHIS-LP	94.1	First Baptist Church	Portageville MO	(CANCELLED CP - 10/14/2003)
DKOFL-LP	97.3	Cameron Knights Of Our Lady Inc.	Cameron MO	(CANCELLED CP - 9/16/2003)
	100.9	Lake Of The Ozarks Latin Cultural Assoc.	Osage Beach MO	(CANCELLED CP - 8/30/2005)
DKVOG-LP	101.3	Gorin Broadcasting Co.	Gorin MO	(CANCELLED CP - 6/21/2004)
DKQPW-LP	102.5	School Of Christ	West Quincy MO	(CANCELLED LICENSE - 6/21/2006)
	107.9	Carthage Crisis Center Inc.	Carthage MO	(CANCELLED CP - 6/5/2006)
	107.9	Restoration Outreach Church	Carthage MO	(CANCELLED CP - 5/4/2006)
	107.9	First Baptist Church	Columbia MO	EXPIRED CP
	107.9	Calvary Chapel Of Joplin	Joplin MO	(CANCELLED CP - 4/15/2008)

DKHQQ-LP	93.1	Faith Christian Center	Helena MT	(CANCELLED CP - 1/17/2008)
DKCTM-LP	93.7	Confederated Salish & Kootenai Tribes Disaster and Emer. Svs.	Elmo MT	(CANCELLED LICENSE 7/1/2009)
DKCTB-LP	94.1	Confederated Salish & Kootenai Tribes Disaster and Emer. Svs.	Lone Pine MT	(CANCELLED LICENSE 7/1/2009)
DKFFD-LP	97.7	Frenchtown Rural Fire District	Frenchtown MT	(CANCELLED CP - 7/7/2005)
DKCTD-LP	97.9	Confederated Salish & Kootenai Tribes Disaster and Emer. Svs.	Dixon MT	(CANCELLED LICENSE 12/12/2012)
DKCTG-LP	98.1	Confederated Salish & Kootenai Tribes Disaster and Emer. Svs.	Turtle Lake MT	(CANCELLED LICENSE 12/12/2012)
	99.5	Harvest Christian Center	Browning MT	EXPIRED CP
	100.9	Billings Seventh-Day Adventist Church	Billings MT	EXPIRED CP
DKCTQ-LP	101.5	Confederated Salish & Kootenai Tribes Disaster and Emer. Svs.	Charlo MT	(CANCELLED LICENSE 12/12/2012)
	101.9	Jefferson County Disaster & Emergency Services	Jefferson City MT	(CANCELLED CP - 9/9/2004)
DKCTP-LP	102.1	Confederated Salish & Kootenai Tribes Disaster and Emer. Svs.	Pablo MT	(CANCELLED LICENSE 12/12/2012)
	102.3	Jefferson County Disaster & Emergency Services	Clancy MT	(CANCELLED CP - 9/9/2004)
	103.5	Plains-Paradise Emergency Services	Paradise MT	(CANCELLED CP - 9/9/2004)
DKZLP-LP	104.1	Hi Plains Amateur Radio Club	Plentywood MT	(CANCELLED CP - 8/2/2005)
DKJRZ-LP	105.3	Libby Area Chamber Of Commerce	Libby MT	(CANCELLED LICENSE 12/3/2012)
	106.5	Madison County Disaster & Emergency Services	Norris MT	(CANCELLED CP - 8/27/2004)
	106.5	Town Of Sheridan	Sheridan MT	(CANCELLED CP - 8/27/2004)

DKCTJ-LP	106.5	Madison County Disaster & Emergency Services	Virginia City MT	(CANCELLED CP - 8/27/2004)
	107.1	Confederated Salish & Kootenai Tribes Disaster and Emer. Svs.	Finely Point MT	(CANCELLED LICENSE 12/12/2012)
	107.1	Madison County Disaster & Emergency Services	Harrison MT	(CANCELLED CP - 8/27/2004)
	107.5	Madison County Disaster & Emergency Services	Alder MT	(CANCELLED CP - 8/27/2004)
	107.5	Madison County Disaster & Emergency Services	Ennis MT	(CANCELLED CP - 8/27/2004)
	107.5	Madison County Disaster & Emergency Services	Pony MT	(CANCELLED CP - 8/27/2004)
	107.5	Madison County Disaster & Emergency Services	"Station 2" MT	(CANCELLED CP - 8/27/2004)
	107.5	Madison County Disaster & Emergency Services	Twin Bridges MT	(CANCELLED CP - 8/27/2004)
DKMDM-LP	107.9	St. Joseph's Educational Assoc.	Polson MT	(CANCELLED LICENSE 12/12/2012)
DKPVA-LP	92.7	Platte Valley Educational Radio	Shelton NE	(CANCELLED LICENSE - 5/31/2012)
DKKCS-LP	102.7	Callaway Village Radio	Callaway NE	(CANCELLED LICENSE - 5/13/2010)
	104.7	St. Michael Educational Radio Assoc.	Hastings NE	(CANCELLED CP - 9/7/2004)
	105.9	Divine Mercy Educational Radio Assoc.	Schuyler NE	(CANCELLED CP - 8/27/2004)
DKNIF-LP	107.9	Calvary Chapel Scottsbluff	Scottsbluff NE	(CANCELLED LICENSE - 2/13/2013)
DKPOT-LP	93.9	Jackpot Combined School	Jackpot NV	(CANCELLED LICENSE 3/28/2012)

	94.1	Silver Springs Christian Radio	Silver Springs NV	(CANCELLED CP - 11/15/2004)
DWFCB-LP	100.3	Kingdom Christian Ministries Inc.	Dublin NH	(CANCELLED LICENSE 11/17/2011)
DWVRM-LP	106.5	Christian Fellowship Of New England	Center Conway NH	(CANCELLED CP - 2/21/2003)
DWXND-LP	107.3	nDimension	Etna NH	(CANCELLED LICENSE 6/3/2008)
	107.9	Lakes Region Conservation Trust	Meredith NH	(CANCELLED CP - 4/23/2003)
DWOOR-LP	101.7	Middle School Of Pleasantville	Pleasantville NJ	(CANCELLED CP - 3/20/2008)
	104.7	International Music Society Inc.	Brick Township NJ	EXPIRED CP
	106.5	Calvary Chapel Of Southern Ocean County	West Creek NJ	(CANCELLED CP - 9/1/2009)
DWYRU-LP	107.9	Hunterdon County ESC	Flemington NJ	(CANCELLED CP - 4/17/2006)
	107.9	The Profetic Voice Inc.	Readington NJ	EXPIRED CP
DKHMA-LP	92.7	New Mexico State Highway & Transportation Dept.	Chama NM	(CANCELLED CP - 9/14/2004)
	94.7	New Mexico State Highway & Transportation Dept.	Clayton NM	(CANCELLED CP - 10/5/2004)
DKZEZ-LP	95.7	Shuler Restoration Commission Inc.	Raton NM	(CANCELLED CP - 9/27/2004)
DKTOS-LP	96.9	New Mexico State Highway & Transportation Dept.	Taos NM	(CANCELLED CP - 9/10/2004)

DKART-LP	97.7	Taos Institute Of Arts Inc.	Taos NM	(CANCELLED CP - 9/9/2004)
DKMRT-LP	101.1	New Mexico State Highway & Transportation Dept.	Moriarty NM	(CANCELLED CP - 10/5/2004)
	101.3	Carlsbad Educational Prayer Assoc.	Carlsbad NM	(CANCELLED CP - 9/7/2004)
DKUAB-LP	101.7	New Mexico State Highway & Transportation Dept.	Cuba NM	(CANCELLED CP - 9/10/2004)
DKLME-LP	101.7	New Mexico State Highway & Transportation Dept.	La Mesita Negra NM	(CANCELLED CP - 9/10/2004)
KGCI-LP	101.7	Gateway Church	Roswell NM	EXPIRED CP
DKLDA-LP	102.5	New Mexico State Highway & Transportation Dept.	Carlsbad NM	(CANCELLED CP - 9/10/2004)
DKIVO-LP	104.1	New Mexico State Highway & Transportation Dept.	Clovis NM	(CANCELLED CP - 9/10/2004)
DKFOS-LP	104.1	New Mexico State Highway & Transportation Dept.	Fort Sumner NM	(CANCELLED CP - 9/10/2004)
	104.5	Sacred Heart Educational Assoc.	Las Vegas NM	(CANCELLED CP - 5/2/2005)
	104.5	Calvary Chapel Ruidoso	Ruidoso NM	(CANCELLED CP - 9/16/2008)
DKRWL-LP	105.5	New Mexico State Highway & Transportation Dept.	Roswell NM	(CANCELLED CP - 9/10/2004)
DKRSO-LP	106.1	New Mexico State Highway & Transportation Dept.	Santa Rosa NM	(CANCELLED CP - 10/5/2004)
DKUUM-LP	106.5	New Mexico State Highway & Transportation Dept.	Tucumcari NM	(CANCELLED CP - 9/10/2004)
	106.9	New Mexico State Highway & Transportation Dept.	Alamogordo NM	EXPIRED CP
DKRZO-LP	106.9	New Mexico State Highway & Transportation Dept.	Carrizozo NM	(CANCELLED CP - 10/5/2004)

DKSNJ-LP	106.9	New Mexico State Highway & Transportation Dept.	San Jon NM	(CANCELLED CP - 10/5/2004)
DKVAU-LP	106.9	New Mexico State Highway & Transportation Dept.	Vaughn NM	(CANCELLED CP - 9/10/2004)
	107.1	New Mexico State Highway & Transportation Dept.	Lordsburg NM	EXPIRED CP
DKAON-LP	107.1	New Mexico State Highway & Transportation Dept.	Raton NM	(CANCELLED CP - 9/10/2004)
DKRWE-LP	107.1	New Mexico State Highway & Transportation Dept.	Rowe NM	(CANCELLED CP - 9/14/2004)
	107.5	New Mexico State Highway & Transportation Dept.	Deming NM	EXPIRED CP
DKTIA-LP	107.9	New Mexico State Highway & Transportation Dept.	Artesia NM	(CANCELLED CP - 9/9/2004)
DKGLU-LP	107.9	New Mexico State Highway & Transportation Dept.	Gallup NM	(CANCELLED CP - 10/5/2004)
	107.9	New Mexico State Highway & Transportation Dept.	Shiprock NM	EXPIRED CP
	107.9	New Mexico State Highway & Transportation Dept.	Silver City NM	EXPIRED CP
DKOCS-LP	107.9	New Mexico State Highway & Transportation Dept.	Socorro NM	(CANCELLED CP - 10/5/2004)
DKSGI-LP	107.9	New Mexico State Highway & Transportation Dept.	Springer NM	(CANCELLED CP - 10/5/2004)
	107.9	New Mexico State Highway & Transportation Dept.	Truth Or Consequenc es NM	EXPIRED CP
	92.7	New York State Department Of Transportation	Hartford NY	(CANCELLED CP - 10/24/2003)
	92.9	New York State Department Of Transportation	Walton NY	(CANCELLED CP - 10/24/2003)

	93.3	New York State Department Of Transportation	Coopers Plains NY	(CANCELLED CP - 10/24/2003)
	93.3	Shoreham Broadcasting Corp.	Shoreham NY	(CANCELLED CP - 2/26/2008)
DWTNX-LP	93.5	First Baptist Church	Canton NY	(CANCELLED CP - 3/22/2005)
	93.5	Calvary Chapel Of Suffolk County	Central Islip NY	(CANCELLED CP - 10/14/2003)
DWSPH-LP	93.7	Ellenville Outreach Services	Ellenville NY	(CANCELLED CP - 9/11/2007)
	94.1	New York State Department Of Transportation	Watertown NY	(CANCELLED CP - 10/24/2003)
	94.3	New York State Department Of Transportation	Godeffroy NY	(CANCELLED CP - 10/24/2003)
	94.3	Jesus Christ's Community	Jefferson NY	(CANCELLED CP - 9/11/2003)
	94.9	New York State Department Of Transportation	Owego NY	(CANCELLED CP - 10/24/2003)
	95.1	New York State Department Of Transportation	Witherbee NY	(CANCELLED CP - 10/24/2003)
	96.1	New York State Department Of Transportation	Waterloo NY	(CANCELLED CP - 10/24/2003)
	96.9	New York State Department Of Transportation	Austerlitz NY	(CANCELLED CP - 10/24/2003)
	97.1	The Enlarged City School District	Hudson NY	(CANCELLED CP - 6/30/2003)
	97.1	New York State Department Of Transportation	Porter Corners NY	(CANCELLED CP - 10/24/2003)
	97.5	New York State Department Of Transportation	Warrensburg NY	(CANCELLED CP - 10/24/2003)
	97.9	New York State Department Of Transportation	Belmont NY	(CANCELLED CP - 10/24/2003)

	98.3	New York State Department Of Transportation	Mexico NY	(CANCELLED CP - 10/24/2003)
	98.7	Colonie Educational Radio Services	Colonie NY	(CANCELLED CP - 9/9/2004)
DWNYP-LP	98.7	NY State Thruway Authority	Ripley NY	(CANCELLED LICENSE 12/4/2014)
	99.5	New York State Department Of Transportation	Blue Mountain Lake NY	(CANCELLED CP - 10/24/2003)
	100.1	New York State Department Of Transportation	Albion NY	(CANCELLED CP - 10/24/2003)
	100.5	New York State Department Of Transportation	Sloansville NY	(CANCELLED CP - 10/24/2003)
	101.1	New York State Department Of Transportation	Hornell NY	(CANCELLED CP - 10/24/2003)
	102.5	New York State Department Of Transportation	Dickinson Center NY	(CANCELLED CP - 10/24/2003)
	102.7	New York State Department Of Transportation	Stamford NY	(CANCELLED CP - 10/24/2003)
	103.7	New York State Department Of Transportation	West Beekmantown NY	(CANCELLED CP - 10/24/2003)
	104.1	New York State Department Of Transportation	Hunter NY	(CANCELLED CP - 10/24/2003)
	104.5	New York State Department Of Transportation	Geneseo NY	(CANCELLED CP - 10/24/2003)
DWUWO-LP	104.7	The State University Of New York College At Oneonta	Oneonta NY	(CANCELLED LICENSE 5/1/2012)
	104.7	SUNY College At Oneonta	Oneonta NY	(CANCELLED CP - 4/14/2014)
DWNYL-LP	104.9	Elim Gospel Church Of Lima NY	Lima NY	(CANCELLED LICENSE 10/29/2010)

DWUCA-LP	105.5	New York State Department Of Transportation	Martinsburg NY	(CANCELLED CP - 10/24/2003)
	105.9	Planet Utica	Utica NY	(CANCELLED CP - 9/9/2004)
	106.1	New York State Department Of Transportation	Oneonta NY	(CANCELLED CP - 10/24/2003)
	106.5	New York State Department Of Transportation	Boswell Corners NY	(CANCELLED CP - 10/24/2003)
	107.3	New York State Department Of Transportation	Russell NY	(CANCELLED CP - 10/24/2003)
DWGNW-LP	93.1	Lazurus Ministries Inc.	Pineville NC	(CANCELLED CP - 9/9/2004)
	94.1	Battle Of Kings Mtn. Brigade Of Friends	Grover NC	EXPIRED CP
	95.7	WGNW Radio Ministries Inc.	Candler NC	(CANCELLED LICENSE - 8/23/2013)
	100.5	Christ Bible Teaching Center	Marshville NC	(CANCELLED CP - 10/12/2007)
	100.5	Voice Of Evangelism Cathedral Inc.	Stanley NC	(CANCELLED LICENSE - 7/14/2009)
DWWGT-LP	100.9	Light Of The World	Lincolnton NC	(CANCELLED LICENSE - 11/29/2012)
	101.1	Central Piedmont Community College	Charlotte NC	(CANCELLED CP - 12/11/2007)
DWFEC-LP	103.1	Iglesia Bautista El Camino	Winston-Salem NC	(CANCELLED LICENSE - 8/24/2011)
DWPTP-LP	104.3	Emmanuel Baptist Church	Marble NC	(CANCELLED LICENSE - 12/2/2011)
DWDLV-LP	105.1	Dynamic Living Radio Inc.	Simpson NC	(CANCELLED LICENSE - 12/2/2011)

DWHCR-LP	105.3	The Town Of Hobgood	Hobgood NC	(CANCELLED LICENSE - 8/24/2011)
DWJTX-LP	107.5	Mega Educational Communications	Knightdale NC	(CANCELLED CP - 2/24/2005)
	91.9	Turtle Mountain Community College	Belcourt ND	EXPIRED CP
	93.9	North Dakota Department Of Transportation	Devils Lake ND	(CANCELLED CP - 2/26/2004)
	94.9	North Dakota Department Of Transportation	Dickinson ND	(CANCELLED CP - 2/26/2004)
	95.7	North Dakota Department Of Transportation	Minot ND	(CANCELLED CP - 2/22/2005)
	96.3	North Dakota Department Of Transportation	Valley City ND	(CANCELLED CP - 2/22/2005)
DKXCQ-LP	96.3	Eagle Rose Fellowship	West Fargo ND	(CANCELLED CP - 10/12/2007)
	98.5	Devils Lake Educational Prayer Assoc.	Devils Lake ND	(CANCELLED CP - 2/27/2004)
	98.9	North Dakota Department Of Transportation	Grand Forks ND	(CANCELLED CP - 2/26/2004)
	100.3	Trinity Educational Assoc.	Dickinson ND	(CANCELLED CP - 2/27/2004)
DWWEE-LP	102.3	Seventh-Day Adventists	Jamestown ND	(CANCELLED CP - 2/24/2005)
	102.9	North Dakota Department Of Transportation	Bismarck ND	EXPIRED CP
	92.9	First Baptist Church	Defiance OH	(CANCELLED CP - 8/2/2005)
DWFHZ-LP	95.7	Forest Hills School District	Cincinnati OH	(CANCELLED CP - 4/16/2009)
	95.7	Victory Church	Cincinnati OH	EXPIRED CP

DWNCG-LP	95.7	North Central State College	Mansfield OH	(CANCELLED LICENSE 7/1/2013)
DWHRR-LP	95.7	Our Lady Of The Holy Spirit Center	Norwood OH	EXPIRED CP
	96.1	Holy Redeemer Church	Portsmouth OH	(CANCELLED LICENSE 6/18/2012)
	98.3	Calvary Baptist Church	Tiffin OH	(CANCELLED CP - 10/24/2003)
DWJHE-LP	98.7	Moundbuilders Christian Radio Corp.	Heath OH	(CANCELLED LICENSE 11/3/2011)
DWCRC-LP	102.1	Community Refugee And Immigration Services Inc.	Columbus OH	(CANCELLED CP - 8/7/2008)
DWCRG-LP	102.1	Groveport Madison Local School District	Groveport OH	(CANCELLED CP - 8/7/2008)
	102.5	Village Of Richwood (Ohio)	Richwood OH	(CANCELLED CP - 10/16/2003)
	103.7	Washington Court House City Schools	Washington Court House OH	(CANCELLED CP - 3/23/2005)
DWYCF-LP	104.1	Real Radio Inc.	Defiance OH	(CANCELLED LICENSE 10/24/2007)
DWLHE-LP	104.5	Living Hope Radio	Lancaster OH	(CANCELLED CP - 10/20/2003)
DWPCO-LP	105.7	Fremont Educational Radio Inc.	Fremont OH	(CANCELLED LICENSE 6/18/2012)
	105.9	Dover Alliance Church	Dover OH	EXPIRED CP
	106.1	Sandy Valley Baptist Temple Of Magnolia OH	Magnolia OH	(CANCELLED CP - 8/22/2003)
	106.7	Hope Radio Of Pomeroy	Pomeroy OH	(CANCELLED CP - 11/12/2004)
	92.5	Cherokee Communications Council	Gore OK	(CANCELLED CP - 12/13/2002)

DKCOC-LP	97.7	Hennessey Church Of Christ	Hennessey OK	(CANCELLED CP - 12/13/2002)
DKZIX-LP	101.5	Enid Educational Radio Assoc.	Enid OK	(CANCELLED CP - 2/27/2004)
DKXBI-LP	101.9	Bartlesville Citizenship Network Inc.	Bartlesville OK	(CANCELLED LICENSE 6/3/2013)
DKRTO-LP	103.7	Morrison United Methodist Church	Morrison OK	(CANCELLED CP - 1/9/2003)
DKEIF-LP	104.7	Enid Public Radio Assoc.	Enid OK	(CANCELLED LICENSE 3/22/2013)
DKPOP-LP	107.7	Citizenship Tulsa Inc.	Sapulpa OK	(CANCELLED LICENSE 5/5/2014)
	89.5	Growing Gardens	Hillsboro OR	(CANCELLED CP - 6/4/2014)
	92.1	North Central Education Service District	Condon OR	(CANCELLED CP - 6/4/2004)
DKLBG-LP	92.5	Life At Its Best Inc.	Glide OR	(CANCELLED LICENSE 2/13/2012)
DKPIE-LP	94.3	Community Information System Inc.	Dallas OR	(CANCELLED LICENSE 10/2/2008)
DKSHY-LP	94.3	Sacred Heart Of Jesus Educational Assoc.	Newport OR	(CANCELLED LICENSE 10/30/2013)
	94.7	Lost River High School	Merrill OR	(CANCELLED CP - 9/17/2004)
DKSKQ-LP	94.9	Multicultural Assoc. Of Southern Oregon	Eagle Point OR	(CANCELLED LICENSE 6/28/2011)
DKYON-LP	97.7	Canyonville Christian Academy	Canyonville OR	(CANCELLED LICENSE 10/30/2013)
	99.7	Disciples Way Ministries	Seaside OR	(CANCELLED CP - 4/29/2004)

	99.9	Hood River Christian Fellowship	Hood River OR	(CANCELLED CP - 10/11/2005)
	100.7	Cannon Beach Conference Center	Cannon Beach OR	(CANCELLED CP - 7/1/2004)
	101.1	Cornerstone Community Church Of Ontario Inc.	Ontario OR	(CANCELLED CP - 6/4/2004)
DKQSO-LP	102.9	Western Oregon Radio Club Inc.	Newberg OR	(CANCELLED LICENSE 5/4/2015)
	103.1	North Lake County School	Silver Lake OR	EXPIRED CP
	104.7	Clatskanie School District 6J	Clatskanie OR	(CANCELLED CP - 4/20/2004)
	106.5	Sunriver Owners Assoc.	Sunriver OR	(CANCELLED CP - 11/6/2007)
DKCPU-LP	106.7	Conservation For Central Oregon	Bend OR	(CANCELLED LICENSE 4/9/2012)
DKPOL-LP	106.9	Keep Praising Our Lord Inc.	Canyonville OR	(CANCELLED LICENSE 2/5/2014)
DKBCC-LP	107.9	Bridgeview Community Church	Cave Junction OR	(CANCELLED LICENSE 5/10/2011)
DWQOH-LP	92.7	Meadville Educational Assoc.	Meadville PA	(CANCELLED CP - 9/7/2004)
	94.9	Calvary Chapel Of Russell	Warren PA	EXPIRED CP
	95.5	EE Dept. Of Gannon Univ.	Erie PA	EXPIRED CP
DWWJL-LP	95.9	First Baptist Church	Brookville PA	(CANCELLED LICENSE - 6/12/2007)
DWRAI-LP	99.5	Brookville Area School District	Brookville PA	(CANCELLED CP - 9/10/2004)
DWCDH-LP	99.3	La Casa Dominicana de Hazleton Inc.	Hazleton PA	(CANCELLED CP - 2/18/2015)

DWFBM-LP	100.1	Beaver Springs Faith Baptist Church Inc.	Beaver Springs PA	(CANCELLED LICENSE - 1/23/2012)
	100.3	Fiat Educational Radio Assoc.	Carlisle PA	(CANCELLED CP - 9/7/2004)
	103.5	Greater Johnstown High School	Johnstown PA	EXPIRED CP
DWFSJ-LP	103.7	Godstock Ministries	Indiana PA	(CANCELLED LICENSE - 8/6/2014)
	104.9	Oil Valley Center For The Arts	Oil City PA	EXPIRED CP
	96.5	Zion Bible Institute	Barrington RI	(CANCELLED CP - 7/3/2008)
	96.5	Ephese French SDA Church	Providence RI	EXPIRED CP
DWYLI-LP	93.7	Lake Wylie Community Radio Project	Lake Wylie SC	(CANCELLED LICENSE 1/31/2008)
DWPCW-LP	95.3	Westminster Presbyterian Church	Conway SC	(CANCELLED CP - 10/30/2003)
	97.1	Crossover Ministries	Spartanburg SC	(CANCELLED CP - 10/30/2003)
DWNMI-LP	98.7	City Of North Myrtle Beach	North Myrtle Beach SC	(CANCELLED LICENSE 2/22/2013)
	100.9	Community Educational Radio Inc.	Rock Hill SC	(CANCELLED CP - 11/17/2004)
	101.9	Calvary Chapel Greenwood	Greenwood SC	EXPIRED CP
DWXOR-LP	102.3	Radio Good Hope	Greenwood SC	(CANCELLED LICENSE 8/16/2012)
DWJKU-LP	102.7	South Carolina Ethnic Programmers	Newberry SC	(CANCELLED CP - 10/11/2005)

DWCFN-LP	103.5	Calvary Chapel Of Lexington		Lexington SC	(CANCELLED LICENSE 10/23/2014)
DWSHG-LP	105.9	Educational Radio Of St. George Inc.		St. George SC	(CANCELLED LICENSE 6/25/2008)
WFBP-LP	106.1	Taylors Public Radio Inc.		Taylors SC	EXPIRED CP
	101.5	Beresford Community Radio	Beresford SD		EXPIRED CP
	105.7	TouchMark Radio Of SD	Sioux Falls SD		EXPIRED CP
	93.3	St. Ambrose Educational Assoc.		Collierville TN	EXPIRED CP
DWEHE-LP	95.5	CATV Inc.		Oneida TN	(CANCELLED CP - 6/10/2005)
DWTAZ-LP	98.3	Claiborne Communications Inc.		New Tazewell TN	(CANCELLED LICENSE 9/18/2013)
	98.7	City Of Brentwood TN		Brentwood TN	(CANCELLED CP - 3/6/2008)
DWZLU-LP	98.7	David Lipscomb University		Nashville TN	(CANCELLED CP - 3/6/2008)
	101.1	Maryville Hope Radio Inc.		Maryville TN	(CANCELLED CP - 8/26/2004)
	102.3	Towering Oaks Baptist Church		Greeneville TN	(CANCELLED CP - 3/19/2004)
DWJPC-LP	102.9	East Wood Church Of Christ		Paris TN	(CANCELLED CP - 5/18/2004)
	103.5	Bristol Christian Radio Inc.		Bristol TN	EXPIRED CP
	104.9	Sojourn Christian Ministries		Goodspring TN	(CANCELLED CP - 5/5/2014)
	107.7	First Baptist Church Of Huntland		Huntland TN	EXPIRED CP

	107.9	Southside Baptist Church	Johnson City TN	(CANCELLED CP - 9/16/2004)
DWQFR-LP	107.9	Somerville Educational Broadcasting	Somerville TN	(CANCELLED LICENSE 8/27/2012)
DKYRE-LP	92.7	Sacred Heart Catholic Church	Breckenridge TX	(CANCELLED LICENSE 5/15/2013)
	93.1	Conquest Christian Church	Kerrville TX	EXPIRED CP
	93.5	St. John's Educational Assoc.	Hondo TX	(CANCELLED CP - 4/20/2004)
DKVCC-LP	93.5	Kerrville Church Of Christ	Kerrville TX	(CANCELLED CP - 4/20/2004)
DKROT-LP	94.3	I.F.O.C.P.C. Ministries & Missionaries Inc.	Donna TX	(CANCELLED CP - 4/20/2004)
DKVOJ-LP	95.1	Bethel Church Of Jacksonville Inc.	Jacksonville TX	(CANCELLED CP - 3/6/2008)
DKGTD-LP	95.5	Community Council Of Southwest Texas Inc.	Uvalde TX	(CANCELLED LICENSE 8/1/2013)
	95.5	St. Clare Productions	Victoria TX	(CANCELLED CP - 4/16/2014)
	95.5	St. Luke Catholic Church	Wills Point TX	(CANCELLED CP - 3/18/2004)
DKXDX-LP	95.7	Inter County Amateur Radio Enthusiasts Inc.	Mt. Pleasant TX	(CANCELLED LICENSE 2/11/2014)
	96.1	Shepherd ISD	Shepherd TX	(CANCELLED CP - 5/24/2005)
	96.5	Sulphur Springs Broadcasting Co.	Sulphur Springs TX	(CANCELLED CP - 3/20/2014)
	97.1	Our Lady Of Victory Educational Assoc.	Beeville TX	(CANCELLED CP - 4/20/2004)
	97.1	Assemblage Of Praise Church	Bryan TX	(CANCELLED CP - 6/9/2006)

	97.7	Hidalgo County Texas	Alton TX	EXPIRED CP
DKLGM-LP	97.7	La Joya Independent School District	La Joya TX	(CANCELLED CP - 9/2/2008)
DKJEM-LP	98.1	James Ellison Ministries	Centerville TX	(CANCELLED LICENSE 7/12/2006)
	98.3	Maverick County Texas	Eagle Pass TX	EXPIRED CP
	99.1	St. Joseph Educational Assoc.	Waco TX	(CANCELLED CP - 4/20/2004)
	99.7	Bastrop County Environmental Network	Bastrop TX	(CANCELLED CP - 2/12/2007)
DKNOB-LP	99.9	Community Broadcasting Inc.	Mineral Wells TX	(CANCELLED LICENSE 3/28/2013)
DKETN-LP	100.1	St. Luke Educational Assoc.	Palestine TX	(CANCELLED CP - 3/18/2004)
DKWVB-LP	100.9	Lufkin Family Education Radio	Lufkin TX	(CANCELLED CP - 3/29/2004)
	101.3	City Of Cotulla	Cotulla TX	EXPIRED CP
	101.5	Pearsall Educational Prayer Assoc.	Pearsall TX	EXPIRED CP
	102.1	Grace Temple International Ministries Inc.	Goliad TX	(CANCELLED CP - 4/29/2004)
DKYFF-LP	102.5	St. Theresa Of The Infant Jesus Catholic Church	Premont TX	(CANCELLED CP - 12/19/2005)
	103.3	Harlingen Rosary Cenacle	Harlingen TX	(CANCELLED CP - 9/1/2009)
	103.3	Our Lady Of Guadalupe Communications	Harlingen TX	(CANCELLED CP - 9/1/2009)
DKGRX-LP	103.3	Lubbock Public Access Television	Lamb County TX	(CANCELLED CP - 4/20/2004)
	103.9	San Angelo Educational Assoc.	San Angelo TX	EXPIRED CP

DKLFFK-LP	104.1	Lufkin Educational Assoc.	Lufkin TX	(CANCELLED LICENSE 7/12/2006)
	104.1	St. Ann's Educational Assoc.	Nacogdoches TX	(CANCELLED CP - 4/20/2004)
DKDLP-LP	104.7	Ace Radio Inc.	Ace TX	(CANCELLED LICENSE 11/15/2013)
	104.9	Historic Brownsville Museum	Brownsville TX	EXPIRED CP
	105.1	Cameron County Texas	Brownsville TX	EXPIRED CP
	105.1	Christian Fellowship Church - Brownsville Inc.	Brownsville TX	EXPIRED CP
	105.1	St. Anthony Educational Assoc.	Brownsville TX	EXPIRED CP
	105.3	Graham Educational Assoc.	Graham TX	(CANCELLED CP - 4/20/2004)
	105.5	Victory Educational Assoc.	Paris TX	(CANCELLED CP - 4/20/2004)
	105.9	Our Lady Of The Gulf Educational Assoc.	Port Lavaca TX	(CANCELLED CP - 4/20/2004)
DKZOE-LP	107.1	The Soul Cafe Inc.	Kerrville TX	(CANCELLED CP - 4/19/2004)
	107.1	Hidalgo County Texas	Linn TX	EXPIRED CP
	107.1	St. Mary's Educational Assoc.	Orange TX	(CANCELLED CP - 4/20/2004)
DKBCP-LP	107.9	Royal Independent School District	Brookshire TX	(CANCELLED LICENSE 1/16/2015)
DKPIB-LP	107.9	Padre Island-Flour Bluff Educational Broadcasting	Padre Island TX	(CANCELLED CP - 4/20/2004)
	90.9	Our Lady Of Mt. Carmel Radio Assoc.	Cruz Bay VI	(CANCELLED CP - 4/29/2004)

DKLGU-LP	106.1	City Of Logan	Logan UT	(CANCELLED LICENSE 5/10/2011)
DWRUT-LP	93.3	Vermont Agency Of Transportation	Rutland VT	(CANCELLED CP - 3/18/2004)
DWSPR-LP	94.3	Vermont Agency Of Transportation	Springfield VT	(CANCELLED CP - 9/27/2004)
DWMDB-LP	94.9	Vermont Agency Of Transportation	Middlebury VT	(CANCELLED CP - 3/16/2004)
DWFAI-LP	95.9	Vermont Agency Of Transportation	Fairlee VT	(CANCELLED CP - 3/16/2004)
DWSTW-LP	96.5	Vermont Agency Of Transportation	Stowe VT	(CANCELLED CP - 10/5/2004)
DWTET-LP	96.5	Vermont Agency Of Transportation	Thetford VT	(CANCELLED CP - 3/18/2004)
DWMID-LP	96.9	Vermont Agency Of Transportation	Middlesex VT	(CANCELLED CP - 3/18/2004)
DWMIL-LP	97.1	Vermont Agency Of Transportation	Milton VT	(CANCELLED CP - 3/18/2004)
	97.5	St. Charles Educational Assoc.	Bellows Falls VT	(CANCELLED CP - 5/9/2005)
DWWIL-LP	98.1	Vermont Agency Of Transportation	Williston VT	(CANCELLED CP - 3/18/2004)
DWAOT-LP	98.3	Vermont Agency Of Transportation	Derby VT	(CANCELLED LICENSE 2/2/2015)
DWBOL-LP	98.5	Vermont Agency Of Transportation	Boltonville VT	(CANCELLED CP - 3/16/2004)
DWMAN-LP	98.9	Vermont Agency Of Transportation	Manchester VT	(CANCELLED CP - 3/16/2004)
DWDOV-LP	99.1	Vermont Agency Of Transportation	West Dover VT	(CANCELLED CP - 3/18/2004)

DWORL-LP	99.3	Vermont Agency Of Transportation	Orleans VT	(CANCELLED CP - 12/21/2004)
DWPUT-LP	99.5	Vermont Agency Of Transportation	Putney VT	(CANCELLED CP - 3/16/2004)
DWOOL-LP	100.1	Falls Area Community Television Inc.	Bellows Falls VT	(CANCELLED LICENSE 3/7/2014)
DWRAN-LP	100.1	Vermont Agency Of Transportation	Randolph VT	(CANCELLED LICENSE 12/18/2014)
DWJNN-LP	105.5	Vermont Agency Of Transportation	Jonesville VT	(CANCELLED CP - 3/30/2004)
DWLYN-LP	106.7	Vermont Agency Of Transportation	Lyndonville VT	(CANCELLED CP - 8/30/2005)
	93.9	Calvary Chapel Of Roanoke	Roanoke VA	(CANCELLED CP - 12/30/2014)
	94.1	Heritage Baptist Church	Farmville VA	(CANCELLED CP - 4/14/2003)
DWSBJ-LP	94.5	Shenandoah County (VA) Public Schools	Quicksburg VA	(CANCELLED CP - 12/6/2004)
DWCLM-LP	95.7	Portering The Glory International Inc.	Woodstock VA	(CANCELLED LICENSE 6/23/2011)
DWYQZ-LP	96.7	Clark Communications	Warrenton VA	(CANCELLED CP - 10/22/2006)
DWXRE-LP	97.9	International Religious Society Inc.	Danville VA	(CANCELLED LICENSE 7/7/2011)
	97.9	Rappahannock Association For The Arts And The Community	Washington VA	(CANCELLED CP - 4/21/2003)
DWSUV-LP	102.3	Antioch Baptist Church	Susan VA	(CANCELLED LICENSE 1/12/2011)
DWJRX-LP	102.5	Christian Life Center	Williamsburg VA	(CANCELLED LICENSE 4/4/2008)

WRRW-LP	102.5	The Popular Assembly Of New Horizons 300 And His Sucessors	Williamsburg VA	OFF AIR
DWBRP-LP	102.9	Pulaski Bible Radio Inc.	Pulaski VA	(CANCELLED CP - 8/21/2003)
DWFMC-LP	102.9	Four Mile Creek Baptist Church	Richmond VA	(CANCELLED CP - 8/30/2005)
DWHCK-LP	107.7	Essence Of Love Ministries	Hopewell VA	(CANCELLED LICENSE 6/17/2011)
	94.7	Foothills Life Radio Inc.	Morton WA	(CANCELLED CP - 1/24/2005)
DKAPY-LP	95.5	Dry Creek Community Broadcasting	Port Angeles WA	(CANCELLED LICENSE 5/6/2011)
DKEGO-LP	95.9	Pacific Northwest Tejano Music Assoc.	Sunnyside WA	(CANCELLED CP - 9/9/2004)
	96.3	Calvary Chapel Fellowship Of Wenatchee	Wenatchee WA	EXPIRED CP
DKWPA-LP	96.9	Whidbey Island Center For The Arts	Coupeville WA	(CANCELLED LICENSE 2/5/2014)
DKCHW-LP	97.3	Community Celebrations	Chewelah WA	(CANCELLED LICENSE 2/8/2008)
DKSGB-LP	97.7	Grace Brethren Church	Sunnyside WA	(CANCELLED CP - 9/7/2004)
	97.9	Rural Community Development Resources	Yakima WA	EXPIRED CP
DKZIL-LP	97.9	Steeple Productions	Zillah WA	(CANCELLED CP - 9/2/2004)
DKZLF-LP	98.5	The Church In Pullman	Pullman WA	(CANCELLED LICENSE 2/5/2014)
	98.9	Toledo First Baptist Church	Toledo WA	(CANCELLED CP - 9/17/2004)

DKCTK-LP	99.5	Christ The King Community Church Of Skagit Valley	Mt. Vernon WA	(CANCELLED CP - 3/2/2005)
DKYAO-LP	100.1	Ocean Shores Educational Media	Ocean Shores WA	(CANCELLED LICENSE 2/5/2014)
DKITR-LP	100.5	Northport School District #211	Northport WA	EXPIRED CP
	101.5	Council For Alternative Energy	Kettle Falls WA	(CANCELLED LICENSE 1/18/2007)
DKZIT-LP	101.9	Sam-Sno Educational Media	Olympia WA	(CANCELLED CP - 11/24/2014)
	104.9	Channel Light Broadcasting Of Cathlamet	Cathlamet WA	(CANCELLED CP - 9/10/2004)
DKQHS-LP	104.9	Selah School District No. 119	Selah WA	EXPIRED CP
	105.5	Lake Quinault Community Action Forum	Amanda Park WA	(CANCELLED CP - 6/10/2005)
DWXDB-LP	93.3	Wetzel County Board Of Education	Pine Grove WV	(CANCELLED CP - 3/16/2004)
	95.7	Roots Town Radio Inc.	Charleston WV	(CANCELLED CP - 10/20/2014)
	98.1	Coalfields Society Foundation Inc.	Matewan WV	(CANCELLED CP - 5/2/2006)
DWWHE-LP	98.1	The Celebration Center Of St. Marys	St. Marys WV	(CANCELLED CP - 3/16/2004)
	98.3	Your Community Radio Inc.	N. Mitchell Heights WV	(CANCELLED CP - 4/21/2005)
WXMN-LP	99.1	Corporation For Charlestown Public Broadcasting	Shepherdstown WV	EXPIRED CP
DWVFR-LP	99.7	WBWV Christian Radio Ministry	Fairmont WV	(CANCELLED CP - 5/24/2005)
DWVBL-LP	99.9	Miracle Meadows School Inc.	Salem WV	(CANCELLED LICENSE 12/11/2013)

DWRZC-LP	92.3	First American Prevention Center	Red Cliff WI	(CANCELLED LICENSE 2/13/2013)
	92.7	Mt. Zion Education Assoc.	Baraboo WI	(CANCELLED CP - 10/27/2010)
DWXXD-LP	92.9	St. Jerome Educational Assoc.	Beloit WI	(CANCELLED LICENSE 9/18/2013)
	95.1	Fox Valley Adventist Broadcasting Inc.	Neenah WI	(CANCELLED CP - 5/31/2005)
DWRHS-LP	96.1	School District Of River Falls	River Falls WI	(CANCELLED CP - 10/30/2003)
	96.5	Northwoods Economic Development Project	Crandon WI	(CANCELLED CP - 9/11/2003)
DWSAP-LP	97.1	Wisconsin Polka Appreciation Society Inc.	Dane WI	(CANCELLED CP - 5/2/2006)
	97.7	Calvary Chapel Green Bay	Green Bay WI	(CANCELLED CP - 6/7/2010)
	99.1	Center For Prevention And Intervention	Madison WI	EXPIRED CP
	99.1	Common Ground Church	Madison WI	EXPIRED CP
	99.1	Cornerstone Church	Madison WI	EXPIRED CP
	99.1	St. Matthew's Evangelical Lutheran Church	Madison WI	EXPIRED CP
	99.1	Sun Prairie Community Church	Madison WI	EXPIRED CP
	99.1	Youth With A Mission Inc.	Madison WI	EXPIRED CP
DWREN-LP	101.3	Northern Wisconsin History Center	Ashland WI	(CANCELLED CP - 7/14/2003)
DWCWR-LP	101.3	Cashton Community Wellness Group Inc.	Cashton WI	(CANCELLED CP - 10/14/2003)
DWLXS-LP	101.5	School District Of La Crosse	La Crosse WI	(CANCELLED CP - 5/17/2005)
DWDTS-LP	101.9	Calvary Chapel Appleton	Appleton WI	(CANCELLED LICENSE 4/23/2007)

	103.3	St. Gerard	Sheboygan WI	(CANCELLED CP - 10/16/2003)
	106.7	Heart To Heart Educational Assoc.	Beaver Dam WI	(CANCELLED CP - 10/27/2010)
DWLFK-LP	107.9	Technology Information Foundation	Eau Claire WI	(CANCELLED CP - 4/18/2007)
	103.5	Green River Christian Radio Inc.	Green River WY	EXPIRED CP
DKLWR-LP	105.3	Living Word Ministries	Powell WY	(CANCELLED LICENSE 9/2/2014)

APPENDIX D: NCE-FM AND LPFM FINE ENFORCEMENT

LPFMs FCC fines are not fair, when scaled and compared with NCE-FM station FCC fines.

Low Power FM

Broadcasting Advertisements in violation of Section 399B of the Communications Act of 1934 and Section 73.503(d) of the Commission's rules.

Station, Location	Fine Amount		Date
KXPW-LP, Georgetown, TX Link ¹	\$20,000	12 watts	March 18, 2009
WQAZ-LP, Edmond, WV Link ²	\$16,000	5 watts	February 27, 2015

NCE-FM

Broadcasting Advertisements in violation of Section 399B of the Communications Act of 1934 and Section 73.503 of the Commission's rules.

Station, Location	Fine Amount	Station Power	Date
WCVZ-FM, South Zanesville, OH Link ³	\$9,000	16,000 watts	May 9, 2008
WBLQ-FM, Westerly, RI (WKIV) Link ⁴	\$1,000	1,200 watts	May 9, 2000

1 https://apps.fcc.gov/edocs_public/attachmatch/DA-09-51A1.pdf

2 https://apps.fcc.gov/edocs_public/attachmatch/DA-15-214A1.pdf

3 https://apps.fcc.gov/edocs_public/attachmatch/FCC-08-250A1.pdf

4 https://app.fcc.gov/edocs_public/attachmatch/DA-00-1011A1.pdf

APPENDIX E: CPB FUNDING

LPFMs do not only get a fair shake with the scaling of NCE-FM rules, they also do not get any taxpayer funded CPB (Center For Public Broadcasting) financial support.

Here are a couple of NCE-FM stations and their taxpayer funded grants for 2012:

WBAI, New York City, NY (4,300 Watts)
Radio Community Service Grant \$335,861

WNYC, New York City, NY (5,200 Watts)
Radio Programming \$1,200,000

Radio Community Service Grant \$3,268,541

Other System Support \$10,000

There has never been a case of a full market signal like these stations every having much problem making tons of money in NYC; however, here are two New York City stations who receive public, taxpayer funding.

A \$20,000 fine to WBAI is not the same as a fine to a 5-watt LPFM in a small West Virginia town.

APPENDIX F: COMMISSIONER PAI ON UNDERWRITING

Below is an excerpt from the statement of FCC Commissioner Ajit Pai concerning the denial of the Maricopa Community College District, Request for Experimental Authority to Relax Standards for Public Radio Underwriting Announcements. It demonstrates that even those at the FCC can have a hard time understanding the poorly written NCE-FM underwriting rules.

The difference for LPFM vs all other services, though, is that our licensees unfairly cannot afford the necessary staff of attorneys to help us decipher them.

Commissioner Pai: “In particular, I have a hard time understanding how some of the “underwriting advertisements” that air before many of PBS’s most popular programs, such as Downton Abbey, are lawful if all of the “underwriting announcements” that Maricopa would like to air are statutorily prohibited. For example, if it violates the statute for underwriting announcements to use qualitative adjectives based in fact, how can Viking River Cruises tout its “modern river cruise vessel[s]” in a thirty second “underwriting announcement” that obviously appears designed to entice viewers into taking a river cruise so that they can be “transported . . . to a another world, a world of dramatic landscapes, majestic castles and remarkable characters?”¹

¹ See <http://www.youtube.com/watch?v=f9BQj49zfXg>

APPENDIX G: FCC REPORT TO CONGRESS ON LPFM

The below text is an excerpt from MB Docket No. 11-83 “Economic Impact of Low-Power FM Stations on Commercial FM Radio: Report to Congress Pursuant to Section 8 of the Local Community Radio Act of 2010” in Section IV entitled ”SUMMARY OF THE RECORD IN THIS PROCEEDING”

The following defines the future the FCC sees for LPFM. Basically, while 600 stations die every 15 years, they don't see much change coming.

Scroll to the second section and read the area in bold.

“23. Predictive Judgments: In response to the Bureau’s inquiry in the Public Notice regarding whether the Economic Study should include predictive judgments about the potential effect of future LPFM stations on full-service commercial FM stations, NAB argues that Congress expects the Commission to assess the impact of LPFM stations licensed after the LCRA modifications are implemented. It reasons that Congress contemplated the need to make reasonable predictions given that the study is due before most LPFM stations will be authorized under the revised rules. NAB presumes that Congress required a study to enable it to consider further legislative changes if an adverse impact is predicted and that there would be little value to a study assessing the impact of licensing rules that no longer apply. Commenter Don Schellhardt agrees with NAB that the Commission’s analysis should include predictions about the impact of future LPFM stations, but he cautions that predictions about the future are necessarily speculative and should be discounted accordingly. Several commenters point out the difficulties inherent in using data regarding current LPFM stations to make predictive judgments about LPFM stations yet to be licensed. CCB, for example, argues that such predictions are likely to be problematic because economic, technological, and behavioral conditions are rapidly changing; there are too many potential variables; spectrum utilization

issues may arise for radio; and the scope and timeline for a future analysis are ill-defined.

24. We agree that we have limited ability to assess the economic effects of stations not yet in existence. We do not know how many potential station owners will pursue LPFM licenses after the LCRA is implemented, where they will locate, or what programming formats they will choose. As explained in Section V below and demonstrated in the Economic Study, *the current economic impact of LPFM stations on full-service commercial FM stations appears to be minimal.* We believe that the regulatory restrictions imposed upon LPFM stations, such as 100 watt maximum power levels and noncommercial operating status, will continue to constrain their ability to have a significant economic impact on full-service commercial FM stations after the implementation of the LCRA. In addition, we believe that the current low levels of LPFM listenership in comparison to full-service commercial FM listenership as well as the limited amounts of underwriting on most LPFM stations indicate that their economic impact on full-service commercial stations will continue to be small in the future. Therefore, *we believe we can conclude with some confidence that the economic effects of future LPFM stations likely will be similar to those of LPFM stations currently in operation.*”