



August 19, 2015

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW; Room TWD-204  
Washington, DC 20554

Re: RM No. 11753  
Opposition to LPFM Proposal

Dear Ms. Dortch:

MonsterMedia, LLC ("MonsterMedia"), licensee of Radio Stations KCYK-AM and KLJZ-FM in Yuma, Arizona, submits this letter in opposition to the rule making proposal submitted by the Low Power FM Advocacy Group regarding alleged "necessary improvements" to the LPFM Radio Service. MonsterMedia submits that the requested changes are neither necessary nor an improvement to the overall FM radio broadcast service.

The Advocacy Group requests, among other things, that LPFM stations be allowed to air commercial announcements, that LPFM licenses should be allowed to be secured by for-profit entities, and that LPFM stations should be afforded primary status from an engineering and legal standpoint. All of these requests run contrary the Congressional intent behind the creation of the LPFM Radio Service in 1999 and 2000. The LPFM Radio Service was created in response to hundreds of comments filed by churches, religious organizations, student groups, community organizations and activists and musicians seeking to provide truly local radio service. In doing this, the FCC said "we are determined to preserve the integrity and technical excellence of existing FM radio service, and not to impede its transition to a digital future." (FCC Report and Order FCC 00-19, January 27, 2000).

The Advocacy Group wishes to turn LPFM into a miniature commercial radio service and drastically change the LPFM technical standards at the expense of the full power commercial and noncommercial FM radio service. This was never envisioned by Congress or the FCC. If the Advocacy Group gets what it is asking for, the entire full power commercial and noncommercial FM radio service will turn into an interference mess, and if commercial entities are allowed to own and operate LPFM stations then those low power stations will largely become translator stations, thereby erasing the local program service purpose behind the creation of the LPFM Radio Service.

The FCC must reject the Advocacy Group's proposal in its entirety.

Sincerely,

Gordon Keith Lewis  
Chief Executive Officer

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