

I, Linda A. Davidson, now respectfully file my comments supporting RM-11753. I am the Chair of The Inge Davidson Foundation ("IDF"), permittee of WZML-LP located at Bryn Mawr, PA. When we sign on we will be the only 100% women owned FM station in the area and possibly all of Pennsylvania. We will also be the only locally owned and operated community FM station (and full time station period) for almost a quarter of a million people. LPFMs have a unique ability to serve communities that have long been abandoned by other radio stations, many who are now serving larger cities. This is our case – where most FM stations in our area are busy trying to serve Philadelphia, our thrust is to super serve the diverse communities West of Philadelphia known collectively as The Main Line and located in Chester, Delaware and Montgomery Counties. Adopting RM-11753 will allow us to accomplish this better. LPFMs have been (and continue to be) attacked by (the) larger broadcasters, many of whom are fearful that our ties to our local communities will somehow hurt their stations. As proof of this I mention the informal complaint filed on July 31st, 2015 by Beasley Media Group ("Beasley") against Hispanis Arts ("Hispanic") the permittee of WVVF-LP, Town N' Country, FL (permit File Number 20150601AAC) where Beasley essentially claims 'sour grapes' that WVVF-LP's Spanish format is somehow 'hurting' their owned class C2 (50,000 watt) commercial WYUU-FM and asking that the Commission suspend WVVF-LPs automatic program test authority until Hispanic "operates the station in a manner consistent with FCC requirements for Low Power FM stations". The Commission has never, **ever** involved themselves in radio station formats (and I'm sure that Beasley would scream bloody murder if The Commission tried to do this to *them*), yet this is exactly what Beasley wants The Commission to do. Fact is, a large part of this rulemaking is all about keeping the large commercial and noncommercial broadcasters from doing what Beasley is attempting to do - exercise format control over another 's radio station, using The Commission as their enforcer!

IDF (and most other LPFM stations) cannot afford the kind of legal 'muscle' that most commercial stations and groups have, so we can only ask and hope that the Commission give LPFM operators a fair chance to serve our local communities to the best of our ability. Everyone already knows that the large radio groups like I Heart, Cumulus, CBS, Beasley, the NAB, Greater Media and others will file comments (mostly by counsel) asking that The Commission reject this proposal. Our only chance to persevere from their attacks is for The Commission to consider the many comments filed by us, the true community broadcasters fairly and objectively.

By adopting this proposal, The Commission is in a unique position to support local radio – and also put the 'big boys' on notice that their bullying tactics will not be tolerated!

Therefore, I urge the Commission to adopt the rule changes proposed in RM-11753.

Respectfully submitted,

Linda A. Davidson, Chair
The Inge Davidson Foundation
August 20, 2015