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WHERE POSITIVE ACTION MATTERS

February 20, 1999

Commissioner Kennard, Chairman  
Federal Communication Commission  
1270 Fairfield Road  
Gettysburg, PA 17325

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FEB 21 1999

Proposed Low Power Fm Radio; MM Docket 95-25

FCC 444600000

Dear Chairman Kennard:

FCC's intention to create and license Low Power Fm Stations is a great idea. However, we suggest the wattages to be increased from 1000 to 5000 watts; 100 to 500 watts; and from 1-10 watts to 15-50 watts. These increments will make it feasible for peoples of the same ethnic cultures, living in larger urban neighborhoods of the same city, to be also reached. For example, we do not think a program service, which will benefit an entire ethnic culture or community, should be limited to only the neighborhood, where the LPFM station is situated, due to a restricted, mileage, coverage area. If the coverage distance is expanded, it will enrich the cultural diversity goal, which, FCC is seeking to establish; and everyone will be the beneficiary.

If the new LPFM wattages are increased as endorsed above, the owners should abide by the rules governing commercial radios. Furthermore, they should advertise. Advertising will enable them to hire experienced staffs to work for their stations. Not many LPFM stations in the urban cities like New York, Los Angeles, Chicago, etc., will be able to raise funds as nonprofit broadcasters. In New York City, for instance, there are some privately owned nonprofit stations already. These stations are managed by well-established broadcasters, organizations, and institutions.

Having LPFMs only as nonprofit stations, will make it harder for them to contract skillful engineers, buy the state-of-art equipment, and sustain a highly sophisticated programming. Moreover, it will not eliminate the stations from being utilized as translator stations retransmitting the programming of full-power stations. Nevertheless, we suggest that owners, who wish to operate as a nonprofit, should be given the privilege to do so. They must, however, state their purpose clearly to FCC in order to avoid miscomprehension.

FCC should formulate a strict ownership restrictions by disallowing the existing broadcasters to have any joint venture, or marketing agreement with an LPFM station. FCC should prohibit anyone from owning more than one station in the same community, if the wattages are increased as advocated in the first paragraph of our comment. No company or an individual should own more than five stations nationwide.

Please, rush us some application forms, whenever the LPFM proposal is approved. We thank the FCC for its foresight in trying to include minorities and diversify the media culture of this nation. It was long overdue! God bless.

Faithfully,

*Amechi Njokanna*  
Amechi Njokanna, President

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