

A. J. Liebling astutely observed, 'Freedom of the press is for those who own one.' The government does not limit our right to print newspapers but it must limit our right to broadcast over the air. Creating new opportunities for people to broadcast enhances our freedom of the press.

I support microradio, 1-10 watt stations. I don't understand why you ask the question: 'We also seek comment on whether the population in these service areas could be large enough to sustain an advertising base.' - if the population does not support it then only noncommercial broadcasters will have such stations. Why not let the market handle it? If no-one uses that portion of the spectrum, reassign it.

As much as I would like to limit the licensing of LPFM stations to noncommercial licensees I understand that some communities, many of them underserved by the broadcast media, have no tradition of public funding and have small businesses that cannot afford to advertise on existing commercial stations. Thus I would divide the spectrum, perhaps half and half, between commercial and noncommercial licensees, a division I would review later on the basis of experience.

More importantly I would exclude anyone who already holds a broadcast license from getting a LPFM license and I would forbid anyone from holding multiple licenses, even in separate markets. Allowing multiple license holding will homogenize the market and allow big money to drown out independent voices. We already see that happening in music radio, single owners providing all content for stations around the country.

The FCC should sell commercial licenses to these new stations as it should have sold all licenses: with the FCC as the only purchaser to whom the licensee can sell the license (and at the price the licensee originally paid for it), not as private property. Bandwidth has a value much greater than equipment now so that we don't need to give broadcasters the incentive of 'owning' their slot to invest in equipment.

Since we need LPFM stations most in areas that have no licenses available I support the notion of existing stations maintaining their 2nd- and 3rd- adjacent interference standards.

Since I support LPFM stations as a means of giving voice to the voiceless I think such licensees have no business selling their subcarriers so if restricting their bandwidth causes them to lose only subcarriers and allows more stations, restrict the bandwidth. I apply the same principle to the use of auxiliary broadcast frequencies: let them use them only for internal purposes, not for resale. For the same reason I would not allow licensees to use them as translators or boosters: such applications do not increase the diversity of voices heard and give those seeking to sell to a large market an incentive to lock up licenses to pursue a larger audience for a single broadcast.

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