

To whom it may concern:

I am a college student interested in LPFM. Although I have no technical background, I have been following the development of Licenced LPFM and low powered community radio. During the academic year I go to Ithaca College. From south hill, I can receive the broadcasts of many stations, unfortunately, none of these stations cater to my listening interests. The stations that I am aware of are either owned by large national and trans-national interests and are therefore tend to have irreverent news and tabloidish reporting. Although there are college and public radio stations whose broadcasts reach south hill, they are either no better than their for-profit counterparts or do not have the breath of public affairs programing and news I am used to at home, in the Washington DC area. I hope that the FCC begins licencing low power radio stations.

I strongly feel that in order to be successful, LPFM stations need to be locally owned. The owner or owner=s primary residences, that is they live there at least 9 months of the year are within 20 to 30 miles of the transmitter, ideally within the station=s broadcast radius. The owner may not be a for - profit corporation or own or work in a management capacity for any other mass media outlet (radio, TV, newspapers, magazines) at the time the licence is issued or at any time there after. The licence may be held either by an individual, group of individuals or a not-for-profit corporation for the purposes of protecting the citizens operating the transmitter from civil suits arising from news and public affairs broadcasts that are critical of corporations, monied interests and wealthy individuals, in the context first amendment protections. But most importantly an individual can only own a single station, or fractional interest in a single station.

The vast majority of the broadcasts need to be locally programed. Content sharing between LPFM stations, however should not be prohibited. I would suggest that permitting no more than 4 or 5 hours of programing daily to be from another station. It would allow the daily broadcast of several documentaries and news programs that were not produced at the broadcasting station.

Frequencies allocation rules should permit the use of 2nd and 3rd adjacent channels in addition to the AProhibited contour overlap≡ method of determining the potential for interference to maximize the availability of frequencies. This is very important since in Ithaca it would be highly unlikely that any unoccupied frequencies can be found using Amilage separation table≡ techniques. I understand that today, it is possible to use computers to determine the effective range of any transmitter and permit the licencing of more stations in a given geographical area than using Amilage separation tables≡. Finally, new frequencies allocations at the top or bottom of the FM dial should be created for Low Power broadcast only and all manufacturers of radio receivers may only produce radios that can pick up these stations.

Stations need to be able to broadcast a sufficient distance to assure survival. I would believe that the most powerful LPFM stations should be permitted to broadcast at least 10-11 miles, as opposed to the 8.8 under the proposal to reach a far larger listening audience and make the attraction of advertisers easier. To maintain independence, no more than 1/20th of advertiser dollars can come from a single source or sources owned by the same conglomerate to assure

financial independence.

When distributing the licencing, I feel that it is vital that a system be devised to assure that all applicants regardless of wealth are able to purchase and keep a licence. Licencing should be first sold to community groups, activists interested in providing alternative news sources for the area, and labor unions, followed by private individuals not affiliated with any of these groups. Stations licencing should not be auctioned off because then only rich groups will be able to own them and will not create a diversity of new voices in the radio spectrum.

Additionally, it is of the utmost importance that LPFM stations are able to latter migrate to Digital radio as these receivers come into use.

Finally, APirate broadcasters,≡ being the pioneers of low power FM, should be allowed to compete for licencing as any other citizen can and have ceased radio equipment returned or monetary compensation provided.

I hope that the FCC takes these suggestions into consideration when creating LPFM regulations.

Sincerely yours,

David Mayer-Sommer