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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

[redacted] January 19, 2000

VIA FAX

Congressman James Saxton
Hon. William E. Kennard

Re: Licensing of community radio stations

Gentlemen:

I am writing this letter to express my strong support for the FCC's creation of a community commercial and noncommercial, low power FM radio broadcasting system, and my opposition to a bill being sponsored by another member of the NJ Congressional delegation which would propose to treat the public broadcast media as the private monopoly of a very few large corporations.

Our country is built on the foundation of an informed populace. For most of us, what happens with our town council, school board, etc. is government's greatest direct impact on our daily lives. FCC policies have favored consolidation of broadcast stations and favored stations that cover huge areas. As a result, major local issues, like $50 million of school construction bond issues in Moorestown and Mt. Laurel, or a fire departments inability to respond to a report a child trapped in a burning house due to lack of volunteers, and little issues, like blood drives, get not even a mention on the only media that can reach people at a critical time, when they are sitting in their car. For many of us, this is one of the few times we do not have information overload, and only broadcast radio is unique in that way. Local issues like this just aren't important to the operators of stations 50,000w stations that cover thousands of other communities in many different states. However, I can hear Rush Limbaugh and other canned, national syndicated material, at all hours of the day and night on more different stations than I can count. Who broadcasts the league of women voters night for the local school board? Right now; nobody. That is the problem you can address and correct.

Here, in Burlington County, we were allocated 1 TV license slot. However, the reality is that that station is a Philadelphia TV station broadcasting all canned content, without so much a 1 minute a week of anything directly related to this area being apparent.

Local stores, local churches, and local political candidates are presently deprived by FCC policy of an effective and affordable means of communicating with their local community. The newspapers and the broadcast media have both experienced similar consolidation and nationalization. I am familiar with studies which show that the existence of a local weekly community newspaper adds roughly 5% to the level of economic activity in a community. I

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would say its certain that community radio, when it existed, had similar effects. These institutions need a cheap and effective means of advertising to prosper; and it is the monopoly on this revenue created by existing FCC policy that I am certain is the real basis of the National Association of Broadcasters opposition. Doesn't it seem odd that an organization of broadcasters doesn't welcome the opportunity to have hundreds of new members join its ranks?

Perhaps the biggest reason to permit commercial stations is that the listening quality is infinitely better than the endless begging for money and the "noncommercial" messages from corporate sponsors on PBS. I believe that it is unlikely a small station such as this could ever be expected to operate as a profitable business, but commercial advertising would allow a community group to pay its bills while rendering a community service. Perhaps the best analogy is the advertising of local businesses in the high school newspaper, to offset some of the printing costs.

As someone who have been interested in radio both professionally and as a hobby most of my life, I view the claims that interference will be a major problem as nonsense. Interference, when it occurs, can be addressed in its specific context, and solutions are usually easy. More and more has been being crammed into every bit of bandwidth for as long as I can remember, and the broadcast spectrum is perhaps the only area that has not seen the large utilization increases by simply employing better technology. At a more general level, current FCC standards for out of band transmission permit this kind of noise at levels thousands of times what is possible by investing in modern equipment; and current operation practices and power levels of major stations insure that they get every last potential listener in their local area, buy reaching hundreds of miles beyond their local areas. Current FCC standards in this area seem to have codified the technology that was in place in the 1960s, and never been revised to reflect the vast improvements in technology. I submit that much of the interference problem may simply be the result of current broadcasters continuing to use obsolete technology. We don't permit it with industrial smokestacks; why to we permit it with broadcast antennas, and then use that permission as a justification to prevent progress. I would applaud an FCC policy that addressed this and brought transmitter power and out of band emissions down across the board.

I understand that what is presently being considered for low power service is a transmitter limitation of 100w and an antenna height limitation of 30 meters. In my local community, which is low rolling topography and often dense foliage, that would probably not be adequate to reach more than about 1/2 the local community. Either a significantly higher antenna or a more transmitter power would be required, because of the relatively high levels of noise (almost always identifiable as high power stations from very great distances away or splatter) on all the FM channels here. I would suggest that the original proposal of 60 meters antenna height and 1000w; coupled with the common radio practice mandate of using the least power required to complete the communication under the conditions, would be better than a 100w/30m limitation which will frequently prove inadequate.

I have just completed reading the Petition for Rulemaking; RM-9292, and the Notice of Proposed Rulemaking; MM-99-25, and find in both as written sound and positive change from

the present state of broadcast radio in America. I urge the Commission to act favorably on them, and should the FCC not act, I urge you, Congressman Saxton, to sponsor a bill that would effect this change by statute.

The FCC recently took a very positive step with regard to the Amateur Radio Service, for which it should be commended. I urge you to take a similar forward looking step with respect to community broadcast radio.

Very truly yours,

Jay A. Garnier

CC: Commissioner Ness
Commissioner Tristani
Commissioner Powell
Commissioner Furthgott-Roth