

More and more this federal government and Congress, under the rubric of reducing their intrusion into our public and private lives, is undermining independent, community-oriented voices in favor of overcapitalized and supercompetitive franchises who chose to dominate our local concerns with their centralized private voices. This is not just a technological issue but a first amendment issue.

The FCC should make every effort to protect low power FM (LPFM) and the community-oriented content it provides. Unlike the consolidated commercial radio landscape, LPFM stations provide quality local programming and enhance the diversity of local voices available to their communities.

Full power stations should not be allowed to cut into the coverage area of LPFM stations and knock them off the air. The FCC should adopt a policy that denies a full power station's modification application if granting the application would reduce the coverage area available to LPFM stations.

Communities need original programming created to serve local and regional needs. To give priority to translators that merely expand the range of distant, often pre-packaged content which serves no local (or arguably even national interest) is to undermine the support of taxes paid by individuals to the federal government in favor of franchises who already have the means to disseminate their programming without federal help. Citizen participation is the cornerstone of good government, this lies at the heart of the Constitution, FCC should give its foremost priority to promoting local citizenry in their attempts to broadcast their views and programs.

LPFM stations also should be afforded higher priority than translators. Translators only repeat programming, sometimes from hundreds of miles away. Every new translator takes the place of a potential LPFM station that would provide original local programming. The FCC should give locally controlled and operated LPFM station applications precedence over translator applications.

To require universal standards for all commercial applications again encroaches on the rights of local communities and their citizens to broadcast programming in the local and community public interest.

The FCC should consider the circumstances under which low power stations operate when determining the rules for their licensing. For LPFM service to be more accessible to community groups, the FCC should modify its rules so that typical changes on a non-profit board would be permissible under FCC rules. Similarly, the FCC should allow low power stations a greater amount of time to construct stations and to shift ownership.

The FCC has the responsibility to protect the service of low power radio and nurture its growth. Congress is considering legislation to expand the service by removing the restrictions on the third-adjacent channel, which could allow LPFM to expand into larger communities. The FCC should take every opportunity to tell Congress that the technological landscape is ready for this change.

