

I agree with the comments summarized by Free Press, as outlined below. I also have three unique comments/questions concerning access to LPFMs by Vermonters. When you opened up the short window to file an LPFM application, there was little if any publicity made to Vermonters. Consequently, the VT Department of Transportation applied for every available frequency, to be able to broadcast traffic reports, weather reports and instructions during an emergency. The rest of the time, the agency has stated that they will provide tourist information. While I find this somewhat valuable, I put forth that a community station run by community members (not a state agency) would provide all of this and more.

I ask you, if this license was truly made to help citizens access to a limited resource, then why have hundreds of these licenses been given to the VT Dept. of Transportation to broadcast what will be essentially similar information to people that don't even live here (tourists)? Plus, no citizens will be involved in the effort; it will be a state (government) enterprise. This seems contrary to the vision with which the LPFM slots came about. Please consider halting the licenses to the VT Department of Transportation and making these licenses available to citizen and non-profit groups that will share the resource more equitably than the state agency will. Furthermore, I ask you to publicize your future window openings well in advance.

Second, I understand that Vermont was one of the last states to have LPFM application windows open. Consequently, Vermonters were some of the last to receive LPFM construction permits, now many years later. I ask you in the spirit of fairness to allow Vermont to be one of the first states to be eligible to apply for the next round of LPFM licenses.

Third and finally, due to the rural nature of Vermont, I believe that Vermonters would benefit from a 10-watt license. Our towns are small and far inbetween. 10 watts would be sufficient for many communities' needs in VT AND allow us to have more access to the spectrum. For example, if you decide to allow the VT Department of Transportation to retain their hundreds of licenses, perhaps you could make 10-watt licenses available to offset the lack of citizen access in those areas. Also, my understanding is that would-be community broadcasters in urban areas would benefit from a 10-watt license, to be able to address neighborhood/borough concerns, as opposed to broadcasting to the entire city. This way, you could make room in the commercial glut for citizen voices and access, in urban areas.

I am eager to receive your response and I expect you, as ones who hold a lot of power (and responsibility with that power) to bend your ears to the People of this country, and not the corporations.

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.

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.

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.