

James L. Kendall
President

October 23, 2006

MB Docket # 06-121
Federal Communications Commission
445 12th Street SW
Washington, DC 20554



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Federal Communications Commission
Office of the Secretary

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Dear Commissioners:

The Association of Free Community Papers respectfully submits these comments with the desire that they be carefully considered by the Federal Communications Commission when considering whether to make changes in the Media Ownership Rules.

AFCP represents nearly 3,000 individual free distribution publications across the country. Our members provide local news and advertising information to their readers. AFCP believes strongly in competition and free enterprise. We embrace it, act it, promote it and collectively serve as a medium to create it on "Main Street, USA."

We support the First Amendment Rights of individuals and companies to freely establish free community papers or any form of print publication anywhere at any time. We invite competition because we believe open competition is good for our readers and communities and, ultimately, good for our members. We believe that freedom of speech of private citizens, the press and of commercial enterprise is protected for reasons beyond tradition.

While newsprint and ink are readily accessible commodities in our economy, the same is not true of the broadcast industry; rather the opposite is true on all counts. Broadcast frequencies are not commodities. The ability to use a frequency is a public trust. As such, it is licensed, conditionally. Maintaining a License is a privilege not a right. And very little of our nation's broadcast spectrum is available.

More people, more voices and more companies would like access to the nation's broadcast spectrum than can be accommodated. The mere possession of an established broadcast license, and its franchise, provide unique and powerful economic opportunities. Cross-ownership of such scarce public resources should remain regulated, while the value and influence of cable and the Internet are allowed to emerge to significant, credible standards of bona fide local media outlets.

We believe that further deregulation of broadcast ownership, under current market conditions, will only lead rapidly to privileged concentration of cross-media dominance and economic power, community by community, by media companies in unique situations, rather than be open to all.

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We strongly oppose lifting the cross-ownership ban on newspaper/broadcast properties, and discourage further loosening of standards that would allow further concentration of the privileged holding of our nation's limited broadcast licenses.

On Behalf of our association and its members,

A handwritten signature in black ink, appearing to read "J L Kendall", is written over the typed name.

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