

WXVU 89.1FM
Villanova University
210 Dougherty Hall
800 E. Lancaster Avenue
Villanova, PA 19085

March 13, 2008

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

To Whom It May Concern:

My name is Suzanne Lee and I am writing on behalf of WXVU 89.1FM – Villanova University’s FM college radio station. It has come to our attention that the FCC is proposing a number of changes for broadcast stations. We feel these changes could invite significant negative effects to college stations, such as our own.

From what we understand the FCC has proposed setting up “community advisory boards” made up of local officials and other community leaders. Our station would then meet with the members of this board on a regular basis, in order that the station could meet the listening preferences of the community. While we appreciate the importance of community response, we feel the introduction of such an advisory board could directly threaten the classic college free-format style, forcing us into a more formatted playlist, much like the commercial stations we try to differ ourselves from. We argue that this will take away from the creativity of the student DJs, and that students will have fewer incentives to even participate. At the same time, there are no guidelines as to how to select the members for the board, and this poses the potential problem of those members not being a represented voice for the entire community, but rather only a select group. Furthermore, as is the case with Villanova, the community of the Main Line, though they do make up a part of our listenership which we greatly respect, hardly represents the *entirety*, nor even the focus of our listenership – our focus is the Villanova students, and we do not want them to lose their voices.

The FCC has also proposed eliminating “unattended operation” programming, an activity we participate in through an Automation program. Unfortunately, this is not a realistic approach for most college radio stations. We are given a set operating budget each year. Most of this budget is tied up in yearly fees – paying lawyers and engineers, small promotions, office supplies, etc. Along with our small budget, we have an impressive, but insufficient staff of around 50 DJs. We can fill many time slots during the day, but cannot even hope, with the many conflicts of college class schedules and the demands of a student life, to fill every spot, every day. We believe many commercial stations are able to have attended operation overnight and for them, this is great. However, for **non-commercial non-profit stations**, with far smaller budgets, no money incentives for their DJs, usually operated on college campuses where radio is just one of many activities students participate in, it is impossible that the station could keep itself staffed completely during its broadcast time, and to ask the station to go off-air would severely hurt our

ability to keep up a solid reputation. We have worked hard to develop an automated music library that reflects our station's image, and we would hate to see it replaced by dead air.

When discussing the final decisions on these proposals, please take strong consideration of the smaller, non-commercial and non-profit, free-format college radio stations that are not equipped with the budget or manpower to fulfill these requests. The student DJs view college radio as an outlet of creativity, and if the proposed changes are allowed, the end result will be a strong disinterest of students even wanting to participate in college radio, and a significant blow to the capabilities, possibilities, and overall reputations of many college radio stations..

Sincerely,

Suzanne Lee

Music Director
WXVU 89.1FM