

To: Office of the Secretary

Comments of Joe Shedlock

I am a listener of WRFN-LP in Pasquo, Tennessee.

I am writing to ask the FCC to consider LPFM stations signals in assigning 307b preferences to full power FM broadcasters applying to change their community of license.

458 low power radio stations have faced encroachment since January 17, 2007, when the FCC changed the process for full power stations to change their community of license from a major modification to a minor modification. In some of the most extreme cases, LPFM stations have been saved from discontinuing their operations through the use of Special Temporary Authorities, allowing these stations to exist in a limbo until the Commission decides on a more permanent resolution. However, in the more common scenario, the main signal area—already small due to the low power of LPFM stations—are significantly degraded due to these move-ins.

Comments in this Rural Radio proceeding detail how full power stations are able to change their community of license based on a preference given to stations providing either a first or second local transmission service to their new community of license. In other words, they are given a preference to move based on the idea that a community that doesn't have their own radio station would be better served if a commercial station were based there. Meanwhile, the fact that the vast majority of these stations do not even maintain studios within their communities of license indicates that these moves are motivated by the desire to serve an adjacent urban community, not the local community of license.

As a listener of an LPFM station, I believe it is unfair that the existence of an LPFM signal is not even considered in determining whether the move will be granted. Unfortunately, the Commission's new streamlined procedure has eliminated the opportunity for public scrutiny in the application for a change in community of license. These moves are justified by being a unique service to a community, but in reality, they cause significant harm to small communities' only accessible broadcasting outlet, their low power radio stations.

I am writing the Commission to ask that changes to communities of license are only approved after an evaluation of the effect of the move on LPFM stations. If the move is found to disturb an LPFM's broadcast, the change should only be allowed pending an evaluation of the public interest. Thank you for your concern for this issue, which in many cases is a matter of life and death for LPFM stations around the country.

Respectfully submitted, &#8232;&#8232;

Signed

Joe Shedlock