

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Policies to Promote Rural Radio Service to)	MB Docket No. 09-52
Streamline Allotment and)	RM-11528
Assignment Procedures)	

**COMMENTS OF
KDRT-LP Licensee DAVIS COMMUNITY TELEVISION**

August 11, 2009

**Davis Community Television
1623 Fifth Street
Davis, CA 95616**

Davis Community Television (doing business as Davis Media Access) is a 501(c)(3) non-profit corporation founded in 1988. DCTV is a community media center serving Davis, CA and surrounding areas. DCTV's main projects are public access Channel 15 on the local Comcast cable system; Educational Access Channel 17 on the Comcast cable system; and KDRT-LP, 95.7 FM, Low-power community radio for Davis.

We are 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.

KDRT-LP was faced with displacement upon the minor amendment of radio station KMJE to move operations from rural Gridley, CA to Woodland, CA. Upon completion of this move, KMJE will become part of the Sacramento Metro market. This market upgrade was only possible with the removal of the license of KDRT-LP and the

subsequent granting of a Special Temporary Authority to operate on a short-spaced channel until further notice. The displacement of KDRT-LP was not part of the original change of community of license application by KMJE. The original design totaled 3 full power contingent applications, however, in order for the market upgrade to occur.

KDRT-LP would advocate for any change of community of license application that is based upon 307(b) preferences to include all FCC licensed facilities in their original application, or such applications would be dismissed. Data about FCC licensed facilities is easily available. Simply put, proposals claiming a preferable FM allotment schema should include all current FM allotments.

We are 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,

KDRT-LP Licensee DAVIS COMMUNITY TELEVISION