

April 5, 2010

FILED/ACCEPTED

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

APR - 6 2010

Federal Communications Commission
Office of the Secretary



RE: Creation of a Low Power Radio Service
MM Docket No. 99-25

Dear Ms Dortch:

I am writing regarding the proposal Educational Media Foundation ("EMF") in its letter of March 24, 2010 to the F.C.C. in reference to the above titled proceeding. In that proceeding, the Commission had proposed to limit the number of full power FM translator applications to ten (10), considering the high volume of those filings and also in light of the potential effect of those applications on the interests of low power (LPFM) broadcasters. National Religious Broadcasters (NRB) had raised some concern regarding a translator application limit of ten (10), and we had suggested that a cap of fifty (50) would be more reasonable. See: Petition of National Religious Broadcasters Regarding Order Imposing Cap on Translator Applications, February 15, 2008. In its recent letter, EMF has suggested that the Commission hold the imposition of a cap on translator applications in abeyance and refrain from proceeding to dismiss translator applications in excess of the cap, pending the outcome of the next LPFM filing window. We believe that this suggestion is a prudent one, and would urge the Commission to adopt it.

By awaiting the results of the next LPFM filing window, the Commission will be able, with a more complete record, to then analyze where, and whether, there will be duplicity and mutual exclusion between LPFM service and intended full power FM translator activity in certain areas. NRB believes this approach would ultimately maximize broadcast coverage in both highly populated markets and rural areas. Because NRB sees the value of both full power FM broadcasting as well as LPFM broadcast services, we urge the Commission to use this approach as a means of efficiently facilitating both.

Yours very truly,

Craig L. Parshall
Senior Vice-President and General Counsel
National Religious Broadcasters

cc: Chairman Julius Genachowski
Commissioner Michael Copps
Commissioner Robert M. McDowell
Commissioner Mignon Clyburn
Commissioner Meredith Attwell Baker
William Lake, Chief, Media Bureau

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