

Comments on:
DA 11-756
THE ECONOMIC IMPACT OF LOW-POWER FM STATIONS ON FULL-SERVICE
COMMERCIAL FM STATIONS
MB Docket No. 11-83

INTRODUCTION:

The Commission created the LPFM service to provide opportunities for new voices to be heard, and to enhance locally focused community-oriented radio broadcasting. After the MITRE report was released to Congress, The Local Community Radio Act of 2010 ("LCRA"), was enacted. It relaxed certain restrictions on low-power FM ("LPFM") stations in order to facilitate the growth of LPFM service. As an officer to an LPFM station for the past 7 years, revenue generation is dependent upon underwriting. Our staff consists of volunteers who love radio, that contribute their time and talent to maintain operations of the station.

OBSERVATIONS:

LPFM stations are limited to the rules of underwriting sponsorship. Full-powered stations do not have this restriction. We have found large businesses prefer to place their add on full powered stations rather than LPFM's simply because commercial stations are not restricted on the content of their commercial announcements, to spite the fact that underwriting donations cost way less. Our revenue is derived from small mom and pop businesses, that cannot afford advertising. Full-powered commercial stations enjoy the ability to collect advertising revenues from large corporate sponsors, LPFM's are restricted from this source of revenue.

LPFM stations cover a minimal area minimizing the effect on market share services. Furthermore most LPFM stations suffer significant interference from full-powered stations on a regular basis causing a greater limitation of potential listenership. This significantly reduces any 'potential' competition against a full-powered station.

CONCLUSION:

Based on the foregoing facts, it is this commenters opinion, that the competition and impacts on passing the statutes of the Local Community Radio Act of 2010 will be insignificant to full-powered stations, and that any attempts to further regulate LPFM would only further jeopardize the LPFM service.