

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

Background: I am the president of Power Ministries, WRLE-LP, Dunnellon, Florida. We are but one small signal in the midst of many of high-powered commercial radio stations that have a primary goal of maximizing their profits. WRLE-LP revenues are about \$100.00 per month. It's not a money issue here, it's a love for radio and our community. The staff consists of non-paid volunteers, who contribute their time and talent to maintain the station. WRLE-LP has been broadcasting over 7 years and over this course of time, the following observations and facts have been realized, and are stated as follows:

Impact on market share:

- a. In general LPFM stations cover a minimal area minimizing the effect on market share services. This significantly reduces any 'potential' competition against a full-powered station.
- b. Being that WRLE-LP is not in a metro market it would be impossible to determine ratings, however given the fact that LPFM's are at a substantially lower power level and are subject to interference from full power stations, it would be safe to say that the impact is insignificant.

Impact on advertising revenue

- a. Our station as well as many others suffer significant regular interference from a full-powered station on a regular basis. The interference is so severe, that our LPFM stations' primary city-grade contour is degraded. This impedes an LPFM stations ability to properly serve their community. This issue is not addressed, and is a common problem with existing LPFM stations. Full power station groups continue to claim that LPFM stations interfere with full power stations, and realistically current-day issues show the opposite to be the case.
- b. LPFM stations are prohibited from airing commercial advertisements, and therefore are unable to directly compete for revenue generation with full-powered stations, which enjoy more relaxed standards. Statements that "LPFM stations are 'siphoning' advertising dollars away from full-service stations" is misleading.

Conclusion:

Based on the foregoing facts, our conclusion is that the competition and impacts on LPFM are insignificant to full-powered stations.