

Received & Inspected

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FCC Mail Room

Stuart C. Hansen
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Sept 1, 2011

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Request for Comments on LCRA 3rd Further Notice, FCC 11-105, dockets MM99-25 and MB 07-712

1) In re "Background", II (4) we feel that a total of 4,219 applications represent "excessive" filings from Radio Assist Ministries (RAM) and Edgewater Broadcasting.

2) In re "Discussion" IIIB 3 (25), we agree with the points made and propose that the adoption of a Market-specific Translator Application Dismissal Processing Policy is needed, fair and preferred. In addition,

We agree with IIIB 3 (26) that establishment of LPFM Channel "floors" and a market-tier approach is equitable and preferred.

We suggest, in light of Background II (4) (RAM), that a limit on translator filings from individual or subsidiary entities be established to prevent monopolies of access to FM channel space. A limit of 10 such filings is proposed.

We agree with IIIB 3 (29) that a 3-prong approach represents a fair and well thought out licensing process.

3) In re IIIC (34), "Prevention of Trafficking", we suggest that translator construction permits be banned from sale. Instead, we propose that those licenses that are not constructed and made operational within one year from date of grant, or are allowed to go off-air per existing rules, revert back to FCC ownership. These, then could be listed as available to bona-fide new applicants. Those that are made operational, stay assigned to the parent licensee and transfer to any new qualified owner, with the parent station, under existing sale and transfer rules.

4) In re IIID (36), "Restrictions on Uses of FM Translators to Rebroadcast Signals of AM Stations", we suggest that, in light of the large stated demand for FM translators by AM stations, that continuation of this policy can only further limit LPFM access as mandated by the LCRA of 2011. Therefore, we feel that continuation of a limit based on those FM translator licenses and/or permits that were authorized as of 1 May 2009 is the appropriate answer.

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We appreciate the significant work the commission has accomplished to define and potentially resolve the complex issues before them.

Your process, as outlined in the Third Further Notice, is well thought out and represents, we think, a fair and equitable solution to the implementation of the LCRA of 2011.

Sincerely,

A handwritten signature in cursive script that reads "Stuart Hansen". The signature is written in black ink and is centered on the page.

Stuart C. Hansen, et al