

Dear FCC:

I would like to comment on the requirements for locally-originated programming for new LPFM stations that are being promoted by Prometheus Radio (their recommended comment is included below). I agree that locally-originated programming should be encouraged in large cities where demand for LPFM stations far exceeds the availability of open frequencies, but a blanket requirement for all LPFM stations would be extreme and unreasonable.

In rural areas where population density is relatively low, there may be few radio stations of any kind. In those situations it may not always be feasible to provide programming that is produced within ten miles of the transmitter. An LPFM station in that situation might provide a great service to the community by broadcasting streaming programs that would not be available otherwise to the local population.

Another situation where it may not be feasible to carry locally produced programming is where there is a new LPFM station. Setting up an LPFM station can be a huge undertaking, and it may take some time for a new organization to develop the resources and the skills needed to provide good programming that is locally produced. If there is a requirement for locally produced programming, it should be phased in over a period of time, and any sanctions against those who are not able to meet the requirements should be measured to serve as an incentive instead of a penalty as are other violations of FCC rules.

Thank you very much,
Lloyd Ewing

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The recommended comment from Prometheus Radio:
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I am writing in support of a locally-originated programming requirement for new Low Power FM (LPFM) stations. LPFM stations are uniquely designed to broadcast locally relevant content, from neighborhood events to homegrown artists to life-saving emergency response.

Thanks to the passage of the Local Community Radio Act, the FCC will be licensing hundreds or even thousands of new LPFM stations nationwide. Yet without a local programming requirement, there's no guarantee that the new stations will fulfill their unique potential. There will likely be stiff competition for these licenses, with many more applicants than available channels. If these scarce

opportunities go to stations with no local content, many cities and towns could miss their last chance at locally responsive community radio.

Other radio stations offer nationally syndicated programming, but diverse local news and local information are missing in today's media landscape. As small newspapers are struggling and broadcasters produce less local news, we need LPFM more than ever.

Please ensure that LPFM stations truly meet local community needs by requiring new LPFM stations to broadcast a minimum amount of locally-originated programming each week.