

Appendix B:

An Analysis of LPFM National Network Affiliations

An Analysis of LPFM National Network Affiliations¹

by Institute for Public Representation on Behalf of Prometheus Radio Project
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From 2008 to 2009, researchers at Penn State University conducted a year-long investigation into the state of the low-power FM (“LPFM”) service in the United States and released a report on their findings called *A Slice of the Pie: Examining the State of the Low Power FM Radio Service in 2009*.² Among the important findings revealed in the report was the fact that out of approximately 1,000 LPFM licensees examined between late 2008 and 2009,

234, nearly a quarter, were either by name or affiliation . . . identified with a national religious organization. In addition, some of the religious organizations self-describe themselves on their web pages as “networks” and list the LPFM stations as “members.” . . .

The three religious organizations that were mentioned most often by LPFM operators interviewed for this study as content providers were EWTN . . . , which is engaged with 25 stations; 3ABN (Three Angels Broadcasting Network), which is . . . engaged with 65 stations; and LifeTalk Radio . . . , which is involved with 33 stations.³

Interviews with station representatives indicated that at least some LPFM stations “affiliated” with national networks did not produce their own programming, instead relying on the network to provide all or substantially all of their programming. For example, one licensee associated with EWTN told interviewers, “All our programming’s by satellite, downloaded by satellite . . . occasionally we’ll broadcast . . .

¹ Prepared to accompany an *ex parte* letter filed on October 11, 2012, in MM Dkt. No. 99-25.

² Colleen Connolly-Ahern, Amit Schejter, Jonathan Obar, & Nadia Martinez-Carrillo, *A Slice of the Pie: Examining the State of Low Power FM Radio Service in 2009* (2009), available at http://papers.ssrn.com/sol3/papers.cfm?abstract_id=2000228). This study was cited in comments filed by Prometheus Radio Project in the LPFM proceeding in May. See Comments of Prometheus Radio Project, MM Dkt. No. 99-25 (filed May 7, 2012) at 41-42. For convenience, a full copy of the study is also filed as an appendix to the *ex parte* letter that this analysis accompanies.

³ *Id.* at 17-18.

a recording of an event maybe that's coming up in our church and that's the only thing that we feed into it ourselves."⁴ An operator of another EWTN station described her operating duties as "not anything, really," explaining that the station was housed "in a closet, it's a very small 100 watt station . . . it pretty much runs itself . . . we do have to employ an engineer and he checks it once a week."⁵ At a station associated with 3ABN, a board member stated, "It's complete download at this point . . . as far as programming goes we are complete download at this time."⁶

Based on their research, the authors of the study commented,

The nearly 200 stations that affiliate with program providers and serve only as local distributors of otherwise non-local content are in every aspect we could divulge from the interviews different from LPFM operators who do not belong to networks: they identify their LPFM activity first and foremost not as members of the local community but of their religious denomination; they maintain the station not in order to benefit the local community but in order to provide access to their organization's mission; and they are committed to the advancement of their organization rather than to the goals of their geographical community.

To determine whether or not these numbers – compiled over three years ago – remain relevant to LPFM policymaking moving forward, on October 5, 2012, Institute for Public Representation ("IPR") staff visited the websites of 3ABN, EWTN, and LifeTalk, to examine these networks' lists of affiliated stations. IPR found that each of these three networks currently lists, as it did when examined by the Penn State researchers, a large number of LPFM stations as affiliates or members. A comparison between LPFM affiliate stations found by the Penn State researchers in 2009 and those found by IPR staff in 2012 finds that LPFM affiliates have actually increased in two of the three networks, and decreased by a few stations in the third network.

⁴ *Id.* at 21-22.

⁵ *Id.* at 24.

⁶ *Id.* at 22.

	Stations in 2009	Stations in 2012
3 Angels Broadcasting Network	65	74
EWTN	25	20
LifeTalk Radio	33	42 ⁷

As of Thursday, October 11, a search of the FM Query database on the FCC website for licensed LPFM stations returns 830 records. The 135 stations affiliated with at least one of these three networks thus represent 16% of all LPFM stations currently licensed.⁸ Moreover, these numbers do not include LPFM stations affiliated with other, smaller national networks providing syndicated content, such as Relevant Radio Network, Footprint Radio Ministry, and Radio 74 Internationale.

The complete findings of the IPR examination follow.

3 Angels Broadcasting Network

In 2009, the Connolly-Ahern team reported that 3 Angels Broadcasting Network (“3ABN”) was engaged with 65 stations. On October 5, 2012, Institute for Public Representation staff visited the 3ABN website and retrieved the following list of LPFM stations from a page on that site titled “3ABN Radio Affiliates” featuring “a list of radio stations that carry 3ABN programming on their channels”:

3ABN Radio Affiliates⁹

	State	City	Call Sign	Frequency
1	Alabama	Bryant	WWFC-LP	FM 99.9
2	Alabama	Henagar	WJSD-LP	FM 94.5
3	Alabama	Ider	WKOC-LP	FM 103.1
4	Alabama	Phenix City	WURY-LP	FM 97.1
5	Arkansas	Decatur	KHBR-LP	FM 96.7
6	California	Lode Pine	KLPC-LP	FM 94.3
7	California	Lodi	KSTG-LP	FM 101.5

⁷ This includes 36 stations identified as LifeTalk “stations” and another 6 identified as “carrying some programming from LifeTalk.”

⁸ One station, KMEI-LP 97.3 FM in Kamiah, Idaho, is claimed as an affiliate on the websites of both 3ABN and LifeTalk.

⁹ The complete list of affiliates, including the full-power and translator stations that have been omitted for this report, may be viewed at <http://3abn.org/networks/3abn-radio/3abn-radio-affiliates/>.

8	California	Needles	KCAN-LP	FM 103.1
9	California	St. Helena	KSHC-LP	FM 106.5
10	Colorado	Pueblo	KTPJ-LP	FM 103.5
11	Florida	Port St. Lucie	WEHR-LP	FM 100.1
12	Florida	Tallahassee	WFSD-LP	FM 107.9
13	Georgia	LaGrange	WRMH-LP	FM 98.9
14	Georgia	Morganton	WAQA-LP	FM 94.5
15	Idaho	Kamiah	KMEI-LP	FM 97.3
16	Illinois	Channahon	WLMM-LP	FM 103.9
17	Illinois	Galesburg	WVCL-LP	FM 95.7
18	Illinois	Quincy	WQIN-LP	FM 102.9
19	Iowa	Davenport	KRQC-LP	FM 107.9
20	Iowa	Hawkeye	KRJE-LP	FM 89.9
21	Kentucky	Hopkinsville	WPJI-LP	FM 94.9
22	Kentucky	Williamsburg	WNLW-LP	FM 95.1
23	Michigan	Cedar Lake	WGLN-LP	FM 93.5
24	Michigan	West Branch	WAWB-LP	FM 107.3
25	Minnesota	Cambridge	WUSG-LP	FM 88.7
26	Minnesota	Moose Lake	WMLA-LP	FM 99.7
27	Missouri	Fulton	KRFL-LP	FM 107.9
28	Missouri	Poplar Bluff	KYHO-LP	FM 106.9
29	Missouri	St. Joseph	KLHM-LP	FM 100.7
30	Montana	Eureka	KEUR-LP	FM 107.7
31	Montana	Kalispell	KANB-LP	FM 102.3
32	North Carolina	Hendersonville	WFHC-LP	FM 97.3
33	North Carolina	Liberty	WJOF-LP	FM 97.9
34	North Carolina	Lincolnton	WWGT-LP	FM 100.9
35	North Carolina	Morganton	WHGW-LP	FM 100.3
36	North Dakota	Bismarck	KBEP-LP	FM 93.7
37	North Dakota	Grand Forks	KOBT-LP	FM 101.3
38	North Dakota	Minot	KSAF-LP	FM 104.1
39	New Mexico	Lovington	KCMG-LP	FM 100.1
40	New York	Arcade	WNAR-LP	FM 100.3
41	New York	Binghamton	WLRF-LP	FM 94.3
42	New York	Corning	WLRG-LP	FM 107.5
43	New York	Cortland	WDRX-LP	FM 100.7
44	New York	Jamestown	WIHR-LP	FM 94.1
45	Nevada	Fallon	KAVS-LP	FM 93.9
46	Ohio	Athens	WYWH-LP	FM 104.5
47	Ohio	Bowling Green	WWOC-LP	FM 97.7
48	Ohio	Marietta	WWOH-LP	FM 104.5

49	Oregon	Brookings	KSEP-LP	FM 99.9
50	Oregon	Burns	KBWR-LP	FM 98.1
51	Oregon	Coos Bay	KBAV-LP	FM 103.9
52	Oregon	Glide	KLBG-LP	FM 92.3
53	Oregon	Gold Beach	KTJN-LP	FM 101.1
54	Oregon	John Day	KSPL-LP	FM 98.1
55	Oregon	Lakeview	KROE-LP	FM 98.1
56	Oregon	Roseburg	KLLF-LP	FM 106.7
57	Pennsylvania	Erie	WXNM-LP	FM 95.9
58	Tennessee	Athens	WKPJ-LP	FM 104.5
59	Tennessee	Calhoun	WYMA-LP	FM 97.9
60	Tennessee	Dickson	WLTD-LP	FM 100.7
61	Tennessee	Jamestown	WSAB-LP	FM 92.5
62	Tennessee	LaFollette	WGND-LP	FM 101.7
63	Tennessee	Spencer	WSPE-LP	FM 93.1
64	Texas	Temple	KRYH-LP	FM 104.7
65	Vermont	Barre	WJPL-LP	FM 92.1
66	Vermont	Rutland	WMTZ-LP	FM 95.7
67	Washington	Republic	KETL-LP	FM 100.5
68	West Virginia	Fairmont	WBWG-LP	FM 99.1
69	West Virginia	Spencer	WMCC-LP	FM 105.7
70	Wisconsin	Chippewa Falls	WHRC-LP	FM 97.3
71	Wisconsin	Eau Claire	WJLM-LP	FM 96.9
72	Wisconsin	Menomonie	WPHF-LP	FM 105.3
73	Wisconsin	Rice Lake	WWJP-LP	FM 101.7
74	Wisconsin	Superior	WGHF-LP	FM 93.7

EWTN Global Catholic Radio Network

In 2009, the Connolly-Ahern team reported that EWTN Global Catholic Radio Network was engaged with 25 stations. On October 5, 2012, Institute for Public Representation staff visited the EWTN website and retrieved the following list of LPFM stations from a chart on that site titled “EWTN Global Catholic Radio Network Affiliates”:

EWTN Global Catholic Radio Network Affiliates¹⁰

¹⁰ The complete list of affiliates, including the full-power and translator stations that have been omitted for this report, may be viewed at <http://www.ewtn.com/radio/amfm.htm>.

	State	City	Call Sign	Frequency
1	Arkansas	Rogers	KDUA-LP	FM 96.5
2	Arkansas	Marshall	KPJN-LP	FM 101.1
3	Florida	Stuart/Palm City	WJPP-LP	FM 100.1
4	Iowa	Burlington	KCDM-LP	FM 98.3
5	Iowa	Carroll	KYMJ-LP	FM 103.1
6	Iowa	Fort Madison	KDME-LP	FM 98.3
7	Iowa	Iowa City	KOUR-LP	FM 92.7
8	Iowa	Marshalltown	KCRM-LP	FM 96.7
9	Iowa	Muscatine	KTDC-LP	FM 105.3
10	Kansas	Dodge City	KODC-LP	FM 102.1
11	Kentucky	Hopkinsville	WSPP-LP	FM 93.5
12	Kentucky	Owensboro	WIMM-LP	FM 107.7
13	Montana	Great Falls	KSMR-LP	FM 97.1
14	Montana	Shelby	KFAS-LP	FM 95.7
15	Oregon	Newport	KSHY-LP	FM 94.3
16	Texas	Breckenridge	KYRE-LP	FM 92.7
17	Texas	Huntsville	KPIA-LP	FM 102.5
18	Texas	Plainview	KOLF-LP	FM 100.7
19	Wisconsin	Ashland	WWMD-LP	FM 95.5
20	West Virginia	Purgitsville	WHMG-LP	FM 98.7

LifeTalk Radio

In 2009, the Connolly-Ahern team reported that LifeTalk Radio was involved with 33 stations. On October 5, 2012, Institute for Public Representation staff visited the EWTN website and retrieved the following list of LPFM stations from a chart on that site titled “Stations”:

LifeTalk Stations¹¹

	State	City	Call Sign	Frequency
1	Alaska	Wrangell	KWRG-LP	FM 99.9
2	California	Arroyo Grande	KWOL-LP	FM 103.7
3	California	Paradise	KRGR-LP	FM 101.3
4	Colorado	Pueblo	KTPJ-LP	FM 105.9
5	Florida	Tallahassee	WFSD-LP	FM 107.9
6	Georgia	Albany	WSRD-LP	FM 93.1

¹¹ The complete list of stations, including the full-power and translator stations that have been omitted for this report, may be viewed at <http://www.lifetalk.net/article/4/stations>.

7	Georgia	Calhoun	WLOJ-LP	FM 102.9
8	Georgia	Carrollton	WGGR-LP	FM 95.3
9	Idaho	Kamiah	KMEI-LP	FM 97.3
10	Illinois	Peoria	WWKJ-LP	FM 102.9
11	Indiana	Shelbyville	WSHI-LP	FM 98.5
12	Kansas	Thayer	KTHA-LP	FM 100.5
13	Michigan	Berrien Springs	WSFT-LP	FM 105.5
14	Michigan	Marshall	WMLY-LP	FM 93.1
15	Minnesota	Cambridge	WUSG-LP	FM 88.7
16	Minnesota	Hinckley	WYSG-LP	FM 96.3
17	Montana	Missoula	KWLY-LP	FM 104.9
18	Nevada	Winnemucca	KKTT-LP	FM 97.9
19	New York	Glens Falls	WBLN-LP	FM 104.9
20	New York	Kingston	WKHV-LP	FM 103.9
21	North Carolina	Elizabethtown	WDJD-LP	FM 93.7
22	North Dakota	Dickinson	KPAR-LP	FM 103.7
23	Oregon	Coquille	KLYF-LP	FM 100.7
24	Oregon	La Grande	KFYI-LP	FM 94.3
25	Oregon	Madras	KMAB-LP	FM 99.3
26	Oregon	Tillamook	KGLS-LP	FM 99.1
27	South Carolina	Aiken	WASD-LP	FM 101.9
28	South Carolina	Greenwood	WXOR-LP	FM 102.3
29	Tennessee	Cookeville	WJNU-LP	FM 96.9
30	Tennessee	Vonore	WTRL-LP	FM 95.1
31	Texas	Killeen	KJHV-LP	FM 96.3
32	Texas	Killeen	KHTL-LP	FM 104.7
33	Texas	Killeen	KHSP-LP	FM 104.5
34	Vermont	Newport	WJSY-LP	FM 96.1
35	Washington	Colville	KEIT-LP	FM 102.1
36	Wisconsin	Clear Lake	WPGR-LP	FM 105.7
Carrying Some Programming From LifeTalk:				
37	Arizona	Holbrook	KJNN-LP	FM 94.3
38	California	Lone Pine	KLPC-LP	FM 94.3
39	Illinois	Galesburg	WVCL-LP	FM 95.7
40	Michigan	Cedar Lake	WGLN-LP	FM 93.5
41	South Carolina	Hilton Head	WIAR-LP	FM 100.5
42	Tennessee	Ooltewah	WMYU-LP	FM 99.7

The denotation of six LifeTalk stations as stations “carrying some programming from LifeTalk” strongly implies that the remaining 36 listed stations carry all or substantially all programming from LifeTalk.

Conclusion

The 2009 study by Penn State researchers on LPFM suggests that at that time, a significant minority of LPFM stations derived all or substantially all of their programming from national network syndication. More recent research performed by IPR staff indicates that the LPFM landscape today is much the same.