

UNITED STATES OF AMERICA  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, DC 20554

Creation Of A )  
Low Power Radio Service ) FCC Docket No. 99-25

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ADDITIONAL REPLY COMMENTS OF  
REVEREND DR. PHYLLIS NORMAN OF CONNECTICUT  
TO THE EX PARTE WRITTEN COMMENTS  
OF THE UNITED CHURCH OF CHRIST

My name is Reverend Dr. Phyllis Norman. For more than 11 years, I have served as Pastor of Prospect Congregational Church in Prospect, Connecticut. We have more than 350 active members, most (but not all) living in Prospect.

Previously, I served as Pastor of Peace Dale Congregational Church, a United Church of Christ (UCC) congregation, in Rhode Island.

I earned my undergraduate degree at the University of Connecticut. Thereafter, I earned a Master of Divinity degree from Andover Newton School of Theology and a Doctor of Divinity degree from Hartford Theological Seminary.

As you can see, I have had a chance to know Southern New England well.

In Prospect itself, I have spent several years as a volunteer with the Town of Prospect's Commission on Aging. Now I serve as the Commission's Chair. In addition, for several years I have served on the Board of Directors of the Greater Waterbury Interfaith Ministries (GWIM).

I am not a Member of THE AMHERST ALLIANCE, but I am a longtime personal friend of Don Schellhardt, its Co-Founder and current President.

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I can assure you that Don is an honorable man and a committed, though unorthodox, Christian. He doesn't say it out loud very often -- because he rightly fears that too much self-congratulating "righteousness" can lead to intolerance and illusions of infallibility -- but Don truly believes he is doing God's work by promoting Low Power FM radio stations.

In any event, I recently signed the November 6, 2012 Reply Comments of Don Schellhardt, Nick Leggett and 13 others to the October 30, 2012 Ex Parte Written Comments of the national United Church of Christ. Now I am filing Additional Reply Comments, on my own behalf.

I just want to say that, as a practicing minister, I would much rather have a truly local Low Power FM station in my community than a religious network station which poses as an LPFM station. With an LPFM station that actually serves a religious radio network, rather than my local community, I would have essentially no chance of getting radio coverage of services and/or other activities by my church. The local Roman Catholic church would have no meaningful chance, either, and neither would the local Baptist church. With a truly local LPFM station, however, all three of the churches in Prospect would have a fair chance of getting some air time if we want it.

A local programming requirement would actually create an *incentive* for locally based LPFM stations to include local religious organizations in their programming mix. After all, local religious institutions can offer truly local LPFM stations a more or less instant and "pre-packaged" start toward meeting a local programming requirement.

Even in the small town of Prospect, with a population of less than 10,000 people, our three churches collectively generate enough activities to meet a local programming requirement of 20 hours per week (as proposed by PROMETHEUS RADIO PROJECT). Throw in sports events at local schools and you'd be over the top for sure.

Down the mountain to our east, in the larger town of Cheshire, an LPFM station could find synagogues as well as churches. Down the mountain to our north, in the city of Waterbury, an LPFM station could find mosques.

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If the Commission adopts instead the local programming requirement that THE AMHERST ALLIANCE has proposed -- 8 hours of locally originated programming per day, following a “ramp up” from 2 hours per day over a period of 2 years -- the local LPFM station would have to “stretch” but could still reach its target with enough creative thinking and “elbow grease”. One major example would be news reporting opportunities in the city of Waterbury, whose “colorful” politics have featured Mayors who were sent to jail, a police chief (now the Mayor) who was stopped for drunk driving and a pattern of gross under-representation of Hispanics and blacks in city government.

In most cases, I suspect, the result of collaboration between religious groups and LPFM stations would not be a *religious* station with a primary focus on local religious activities. The result would be a *pluralistic* community station which *includes* coverage of local religious activities alongside a wide range of secular programming.

### **Willingness Of My Own Church To Help LPFM Stations**

Let me add, in closing, that my own local institution -- Prospect Congregational Church -- has already informed Don Schellhardt and another local LPFM activist, Wesli AnneMarie Dymoke of Cheshire, that we are willing to make our church available for organizational meetings related to starting up one or more local LPFM stations, anywhere in Greater Waterbury.

I have also informed Don and Wess that Prospect Congregational Church would consider renting out space in our steeple for an LPFM transmitter. Since the Town of Prospect is spread across an elevated plateau, the steeple happens to be one of the highest elevations in Connecticut.

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### **Notifications**

A copy of this document is being sent, electronically, to the United Church of Christ Office of Communications in Washington, D.C. ([uccmediajustice@gmail.com](mailto:uccmediajustice@gmail.com)), Cheryl Leanza, Esquire of A LEARNED HAND in Maryland ([cleanza@ALHmail.com](mailto:cleanza@ALHmail.com)), Wesli AnnMarie Dymoke of Cheshire ([wesdym@gmail.com](mailto:wesdym@gmail.com)) and Brandy Doyle of PROMETHEUS RADIO PROJECT in Pennsylvania ([brandy@prometheusradio.org](mailto:brandy@prometheusradio.org))

Respectfully submitted,

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