

College Radio Day
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Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Docket 99-25, LPFM Service
Letter/Comment, NYC LPFM in Light of Hurricane Sandy

Dear Federal Communications Commission,

This letter is to express my sincere support for LP-10 service in Brooklyn, NY. As a radio professional, educator, and founder of College Radio Day (uniting 585 non-commercial radio stations) I can testify to the importance of radio stations in providing an important connection to the local community. An LP-10 service in Brooklyn would enrich the community considerably and also provide an important place for the residents of Brooklyn to ‘go to’ on the radio dial. I believe such a service is needed and would be greatly valued.

Recently we discovered that the FCC that due to the wording within the Local Community Radio Act, LP-100 service will not be available in the New York City vicinity. However, we found that New York City could accommodate multiple LP-10 channels if the FCC maintains the LP-10 rules. We would like to voice our support for opening LP-10 for many reasons.

Storms like Hurricane Sandy underscore the need for emergency neighborhood communication services: In light of the devastation in NYC—destruction of property, loss of life, lack of shelter—emergency services like low power FM are indispensable. It has now been demonstrated cell phone and internet systems are susceptible to prolonged failure in storms that are becoming the new normal. A ten watt radio station can serve an area of 100,000’s of people, and run on a standard generator. Currently there are zero community/neighborhood stations in the NYC area. It is imperative that the FCC considers this life-saving resource. If not, translators, a completely useless service for these instances, will utilize these low power channels instead.

The LCRA “ensures” NYC area’s right to apply for LPFM services: Section 5 of the Local Community Radio Act of 2010 is supposed to ensure both LPFM and translator availability. The act states these decisions be “based on the needs of the local community.” The Act makes no distinction between LP-100 and LP-10—these are both legitimate LPFM services. By eliminating LP-10 service, translator applicants will obtain all the open channels in the NYC area. This option would plainly ignore the LCRA.

A study by Common Frequency revealed that 43% of the pending translators in the NYC metro are proposed at 10 or less watts: If the FCC decides not to allow LP-10 service, it will go on to license many 10 watt translators. We believe this decision is arbitrary and possibly favors translator applicants.

We believe there the reasons listed above provide ample support for LP-10 in the NYC area.

Sincerely,

A handwritten signature in black ink, appearing to read "Rob Quicke", with a horizontal line drawn underneath the name.

Dr. Rob Quicke
Founder, College Radio Day

CC: Julius Genachowski, Chairman
Ajit Pai, Commissioner
Mignon Clyburn, Commissioner
Jessica Rosenworcel, Commissioner
Robert M. McDowell, Commissioner
Peter Doyle, Chief, Audio Division
Commissioner Legal Advisors: Sherrese Smith, Angela E. Giancarlo, Dave Grimaldi, David Goldman, Matthew Berry