

November 20, 2012

Ms. Marlene H. Dortch, Secretary

Federal Communications Commission

445 12 St. SW

Washington, DC 20554

Re: Notice of *Ex Parte* Presentation, MM Docket No. 99-25 – Creation of a Low Power Radio Service

Dear Ms. Dortch:

On Friday, November 16, Brandy Doyle of Prometheus Radio Project met with Peter Doyle of the Audio Division to discuss issues in the above-referenced docket.

Ms. Doyle expressed Prometheus' support for a preference awarded to LPFM applicants who pledge to maintain a main studio with a meaningful staff presence in the community. However, she raised concern that such a preference might be interpreted too broadly by some licensees with programs unrelated to the proposed radio station. She argued that the preference should only apply to applicants pledging to maintain *station* staff, in other words station operators, programmers, or others doing station business, rather than than staff conducting unrelated business on behalf of the licensee.

Ms. Doyle also raised concerns with the Commission's implementation of the Local Community Radio Act's provisions regarding the protection of FM translator input signals on third adjacent frequencies. Specifically she noted that some translator records in the FCC database appear to be missing data on input signals and delivery methods, preventing LPFM applicants from determining whether their proposed frequencies would be ineligible under the Commission's proposed threshold test. She requested that the Commission seek more complete records from translator stations, or to clarify the location of such data, prior to an LPFM window.

Ms. Doyle also discussed the process by which LPFM applicants may provide a showing to prove "non-interference" to nearby stations. She advocated for procedures that are as simple and inexpensive as possible for grassroots

