

As the station manager of a time shared LPFM owned and operated by a small church. I would like to comment regarding the proposal of Prometheus Radio Project and the Unitarian Church to require 8 hours per day of local, live program origination for all future LPFM licenses. There are many reasons why such a rule would harm local LPFM radio, namely;

a. **Cost**, currently we are able to operate our station by volunteers without using a studio, while we do produce some local programming. To do 8 hours a day live would be expensive and would probably not be possible with a few volunteers. Currently a handful of unpaid volunteers compile our programs, and we rely on automation. While they are loyal and dependable our volunteers have other jobs, to produce 56 original hours of original programming a week would almost certainly require at least two full time paid staff. Not to mention the fact that as a time share we only have 8 hours a day to broadcast. We have some volunteers who do our production professionally producing one hour a day 7 days a week costs upwards of \$1200.00/month, no telling what it would cost to produce eight times that amount of programming to fill a week. A small church like ours does not have the resources for professionally producing 1 hour a day, much less 8. But by using the programming of larger entities, without charge, and giving them air time, we both win. Our station fully supports the costs of operation of the station and we do not solicit support from elsewhere in the community. Financially we could not support 8 hours a day live programming.

b. **Quality**, we are a church, we do a single service once a week, that is one hour a week, the proposed requirement would be 56 hours a week. Currently we download and broadcast recorded teachings from other churches within our denomination and religious programs from other providers. These teachers/preachers are from other cities, they are highly educated, well appreciated and supported by large churches in large cities who can afford such quality much better than our small city of 100,000 population. No small church could consistently produce such original high quality programs. We repeat some programs at other times during the day and week since we know our listeners are not available to listen at all times we broadcast during the day. No single organization is capable of producing 56 hours of thought provoking original teaching, concepts and ideas. It is a simple matter for many churches all over the country to record and make available their teachings and discussions to other churches and it is a win win situation for all.

c. **Localism** is the goal of LPFM's and its what they do best. Adding additional regulations how they meet that goal is ill conceived and restrictive. The proposal seems to carry with it an unspoken agenda to manipulate LPFM's into being what some groups believe they should be for whatever reasons they may have. Certainly an LPFM could provide live programming for 8 hours a day if they wanted, so why dictate the requirement to others who may not. We believe freedom to broadcast our own choice of content, in our own way, is fundamental to this goal.

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