

UNITED STATES OF AMERICA
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554

Creation of A Low Power Radio Service)

FCC Docket 99-25

REPLY OF LET THE CITIES IN!!
TO THE REPLIES OF THE MEDIA ALLIANCE,
REC NETWORKS, COMMON FREQUENCY
AND PUBLIC MEDIA OF NEW ENGLAND D/B/A WHAV

LET THE CITIES IN!! (LTCI) is a recently formed citizens' advocacy group for vigorous expansion of the Low Power FM (LPFM) Radio Service in urban areas. We have filed a Petition For Reconsideration, in FCC Docket 99-25, which calls for licensing of LPFM stations below 50 watts in the "urban core" areas of the Top 100 Arbitron Markets.

The Alternative Approach Of THE MEDIA ALLIANCE

In its Reply to our Petition, THE MEDIA ALLIANCE of California presented an alternative to the proposal in our Petition. The APPENDIX to this document contains a new LTCI study of the 285 incorporated U.S. cities with a population of more than 100,000.

Reply To Replies Of THE MEDIA ALLIANCE Et Al.

April 1, 2013

Page Two

Table I of the study quantifies the estimated impact of applying the MEDIA ALLIANCE approach to: (a) the 50 largest U.S. cities; (b) the 100 largest U.S. cities; and (c) all 285 of the analyzed communities.

The study also documents that the FCC;s current “LP100s only” policy distorts LPFM licensing choices in small and medium-sized cities, not just large ones.

1-10 Watt LPFM Stations

THE MEDIA ALLIANCE of California and COMMON FREQUENCY of California both note that, in some cities, there may be no alternative to 1-10 watt stations if LPFM stations are going to be licensed at all. The outlying Boroughs of New York City were cited as an example, although it appears that the City of Detroit could have been mentioned as well.

We agree with this assessment and believe it bears emphasis,

50-Watt Stations

We thank REC NETWORKS of Maryland for pointing out that LP50 stations are not theoretical constructs. Numerous 50 watt stations exist “in the real world”, where they do not appear to be causing any operational problems.

Reply To Replies Of THE MEDIA ALLIANCE Et Al.

April 1, 2013

Page Three

A Uniform Wattage Range, In Any Given Location,

For LPFM Stations and Translators Alike

In a separate March 19 Reply to PUBLIC MEDIA OF NEW ENGLAND D/B/A WHAV, based in Massachusetts, LET THE CITIES IN!! has already endorsed this excellent proposal, We reiterate that endorsement now.

Notification Of Referenced Parties

A copy of this document has been E-Mailed to Tracy Rosenberg of THE MEDIA ALLIANCE, Todd Urick of COMMON FREQUENCY, Michelle Eyre of REC NETWORKS and Timothy Coco of PUBLIC MEDIA OF NEW ENGLAND D/B/A WHAV.

Respectfully submitted,

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Dated: April 1, 2013

**IT ISN'T JUST THE LARGEST CITIES
THAT NEED LPFM STATIONS BELOW 50 WATTS**

A Study Prepared For
LET THE CITIES IN!!

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LET THE CITIES IN!! (LTCI) is a newly formed citizens' advocacy group. We call for expanding the FCC's recent expansion of the Low Power FM (LPFM) Radio Service, under the Local Community Radio Act, so that all of America's urban areas share in the expansion.

LTCI has filed a Petition For Reconsideration in FCC Docket 99-25, the LPFM Docket. The Petition urges the Federal Communications Commission to modify its current policy of licensing only LP100 stations (50-100 watts) in urban areas. Instead, the Petition asks the FCC to allow radio stations below 50 watts, including LP10 stations (1-10 watts), in the "urban core" areas of the Top 100 Arbitron Markets.

It is widely believed, in much of the LPFM community, that relief from the "LP100s only" policy is largely needed in a handful of large cities with exceptionally high population density (correlated with extreme spectrum scarcity). However, recent research by LET THE CITIES IN!! indicates that this belief is mostly "an urban legend".

LTCI analyzed data for *285 different incorporated cities* with a population which exceeds 100,000. New York City -- #1 in population rank -- faces spectrum scarcity so severe that it will have no LPFM stations at all under current policies. However, the same can also be said of Rialto, California: #283 in population rank.

Indeed, as one moves from the 50 largest U.S. cities down to those cities which rank below #200, a pattern emerges with remarkable consistency. *Roughly 1 city in 3* will be limited to 2 LPFM stations or less -- unless the "LP100s policy" is changed. However, *if one LPFM station below 50 watts is added to the mix for roughly every 8 stations above 50 watts*, each of the 285 cities can have at least 3 LPFM stations.

Roughly half of the nation's "shutout cities" -- with 2 LPFM stations or less -- are found in California. Other clusters of exclusion include places within 100 miles of New York City ... Southern New England, outside of metropolitan New York ... the Baltimore/Washington corridor ... the eastern Great Lakes region (from Buffalo, through Michigan and Ohio, into Illinois) ... plus parts of Texas, Utah and Colorado..

The LP100 frequencies projected for each of the 283 cities were derived from Michelle Eyre's "My LPFM Channel Search Tool" on the REC NETWORKS Web Site (www.recnet.com). The individual frequencies often carry cautionary notes, including "You may receive interference from others" or "Grid translator dismissal assumed".

TABLE I.
 NUMBER OF ADDITIONAL LPFM STATIONS (BELOW 50 WATTS)
 NEEDED UNDER TWO SCENARIOS

2-STATION GUARANTEE:

*LPFM stations below 50 watts are permitted **to the extent necessary** to guarantee at least 2 LPFM stations for each city.*

3-STATION GUARANTEE:

*LPFM stations below 50 watts are permitted **to the extent necessary** to guarantee at least 3 LPFM stations for each city.*

Total Number of <u>LP100s Available</u>	Extra Stations Needed To <u>Meet 2-Station Guarantee</u>	Extra Stations Needed To <u>Meet 3-Station Guarantee</u>
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	50 LARGEST INCORPORATED U.S. CITIES	
246	+13	+30
	100 LARGEST INCORPORATED U.S. CITIES	
519	+28	+57
	285 LARGEST INCORPORATED U.S. CITIES	
1,546	+96	+193

TABLE II.
INCORPORATED CITIES WITH NO LPFM STATIONS AT ALL

(Population rank in parentheses)

Among the 50 largest U.S. cities:

- (1) New York City
- (10) San Jose
- (18) Detroit

Among the next 50 largest U.S. cities:

- (59) Riverside, CA
- (61) Pittsburgh
- (67) Toledo
- (68) Newark, NJ
- (72) Buffalo
- (75) Jersey City
- (97) San Bernardino

*Among the remaining 185 U.S. cities
with a population exceeding 100,000:*

- (114) Moreno Valley, CA
- (115) Yonkers, NY
- (139) Santa Rosa, CA
- (163) Fort Collins, CO
- (166) Paterson, NJ
- (169) Bridgeport, CT
- (171) Lakewood, CO
- (186) Warren, MI
- (199) Elizabeth, NJ
- (206) Stamford, CT
- (216) Allentown, PA
- (223) Denton, TX
- (225) Vallejo, CA
- (227) Provo, UT
- (229) Ann Arbor
- (233) Berkeley
- (258) Cambridge, MA
- (264) Richmond, CA
- (283) Rialto, CA

TABLE III.
INCORPORATED CITIES WITH ONLY ONE LPFM STATION

(Population rank in parentheses)

Among the 50 largest U.S. cities:

- (8) San Diego
- (21) Baltimore
- (22) Boston
- (26) Denver
- (31) Oklahoma City
- (34) Fresno
- (48) Oakland

Among the next 50 largest U.S. cities:

- (76) Chula Vista, CA
- (95) Fremont, CA
- (96) Irvine, CA

*Among the remaining 185 U.S. cities
with a population exceeding 100,000:*

- (112) Fontana, CA
- (121) Glendale, CA
- (127) Worcester
- (132) Providence
- (141) Rancho Cucamonga, CA
- (142) Ontario, CA
- (153) Salem, OR
- (154) Corona, CA
- (161) Pomona, CA
- (162) Joliet, IL
- (167) Hayward, CA
- (170) Syracuse
- (174) Naperville, IL
- (176) Sunnyvale, CA
- (177) Dayton
- (181) Pasadena, CA
- (191) Sterling Heights, MI
- (192) New Haven
- (194) Thousand Oaks, CA

- (200) Simi Valley, CA
- (209) Carrollton, TX
- (218) Santa Clara, CA
- (221) Victorville, CA
- (230) Lansing, MI
- (231) El Monte, CA
- (235) Downey, CA
- (236) Costa Mesa, CA
- (243) Elgin, IL
- (255) West Covina, CA
- (256) Norwalk, CA
- (257) Fairfield, CA
- (267) Burbank, CA
- (270) Palm Beach
- (278) Flint, MI

TABLE IV.
INCORPORATED CITIES WITH ONLY TWO LPFM STATIONS

(Population rank in parentheses)

Among the 50 largest U.S. cities:

- (2) Los Angeles
- (3) Chicago
- (13) San Francisco
- (19) El Paso
- (24) Washington, DC
- (36) Long Beach
- (50) Arlington, TX

Among the next 50 largest U.S. cities:

- (54) Anaheim, CA
- (57) Santa Ana, CA
- (63) Stockton, CA
- (80) Laredo, TX
- (86) Garland, TX
- (93) Irving, TX

*Among the remaining 185 U.S. cities
with a population exceeding 100,000:*

- (111) Aurora, IL
- (122) Huntington Beach, CA'
- (136) Garden Grove, CA
- (147) Lancaster, CA
- (157) Springfield, MA
- (172) Alexandria, VA
- (180) Orange, CA
- (188) West Valley City, UT
- (205) Concord, CA
- (248) Lowell, MA
- (250) Arvada, CO
- (262) West Jordan, UT
- (268) Antioch, CA
- (276) Richardson, TX
- (281) El Cajon, CA
- (284) Santa Maria, CA

RAW DATA:

**PROJECTED NUMBER OF LP100s
IN 285 INCORPORATED CITIES**

(Ranked by population)

- 1. New York City, 0**
- 2. Los Angeles, 2**
- 3. Chicago, 2**
4. Houston, 13
5. Philadelphia, 3
6. Phoenix, 11
7. San Antonio, 8
- 8. San Diego, 1**
9. Dallas, 3
- 10. San Jose, 0**
11. Jacksonville, 14
12. Indianapolis, 6
- 13. San Francisco, 2**
14. Austin, 8

15. Columbus, OH, 4
16. Fort Worth, 5
17. Charlotte, 3
18. **Detroit, 0**
19. **El Paso, 2**
20. Memphis, 9
21. **Baltimore, 1**
22. **Boston, 1**
23. Seattle, 9
24. **Washington, DC, 2**
25. Nashville-Davidson, 3
26. **Denver, 1**
27. Louisville-Jefferson County, 6
28. Milwaukee, 4
29. Portland, OR, 7
30. Las Vegas, 7
31. **Oklahoma City, 1**
32. Albuquerque, 7
33. Tucson, 4
34. **Fresno, 1**
35. Sacramento, 6
36. **Long Beach, 2**

37. Kansas City, MO, 8
38. Mesa, AZ, 7
39. Virginia Beach, 6
40. Atlanta, 4
41. Colorado Springs, 5
42. Omaha, 13
43. Raleigh, 4
44. Miami, 11
45. Cleveland, 5
46. Minneapolis, 6
47. Tulsa, 6
48. **Oakland, 1**
49. Wichita, 12
50. **Arlington, TX, 2**
51. New Orleans, 11
52. Bakersfield, 5
53. Tampa, 15
54. **Anaheim, 2**
55. Honolulu, 9
56. Aurora, CO, 4
57. **Santa Ana, CA, 2**
58. Saint Louis, 14

59. **Riverside, CA, 0**
60. Corpus Christi, 12
61. **Pittsburgh, 0**
62. Lexington-Fayette, KY, 7
63. **Stockton, CA, 2**
64. Cincinnati, 4
65. Anchorage, 4
66. Saint Paul, 7
67. **Toledo, 0**
68. **Newark, NJ, 0**
69. Greensboro, NC, 6
70. Plano, TX, 3
71. Lincoln, NB, 9
72. **Buffalo, 0**
73. Henderson, NV, 5
74. Fort Wayne, 8
75. **Jersey City, 0**
76. **Chula Vista, CA, 1**
77. Saint Petersburg, 17
78. Orlando, 5
79. Norfolk, 5
80. **Laredo, TX, 2**

81. Chandler, AZ, 10
82. Madison, WI, 9
83. Lubbock, TX, 9
84. Durham, 5
85. Winston-Salem, 5
86. **Garland, TX, 2**
87. Glendale, AZ, 5
88. Baton Rouge, 7
89. Hialeah, FL, 11
90. Reno, 3
91. Chesapeake, VA, 5
92. Scottsdale, AZ, 6
93. **Irving, TX, 2**
94. North Las Vegas, 6
95. **Fremont, CA, 1**
96. **Irvine, CA, 1**
97. **San Bernardino, 0**
98. Birmingham, AL, 3
99. Gilbert, AZ, 9
100. Rochester, 11
101. Boise (City), 7
102. Spokane, 12

- 103. Montgomery, AL, 8
- 104. Des Moines, 6
- 105. Richmond, 6
- 106. Fayetteville, NC, 10
- 107. Modesto, 5
- 108. Shreveport, 15
- 109. Tacoma, 10
- 110. Oxnard, CA, 5
- 111. **Aurora, IL, 2**
- 112. **Fontana, CA, 1**
- 113. Akron, 3
- 114. **Moreno Valley, CA, 0**
- 115. **Yonkers, NY, 0**
- 116. Augusta-Richmond County, 11
- 117. Little Rock, 8
- 118. Mobile, 6
- 119. Columbus, GA, 9
- 120. Amarillo, 13
- 121. **Glendale, CA, 1**
- 122. **Huntington Beach, CA, 2**
- 123. Salt Lake City, 3
- 124. Grand Rapids, MI, 4

- 125. Tallahassee, 4
- 126. Huntsville, AL, 14
- 127. **Worcester, 1**
- 128. Knoxville, 6
- 129. Newport News, 5
- 130. Grand Prairie, TX, 3
- 131. Brownsville, TX, 7
- 132. **Providence, 1Port**
- 133. Santa Clarita, CA, 4
- 134. Overland Park, KS, 7
- 135. Jackson, MS, 7
- 136. **Garden Grove, CA, 2**
- 137. Chattanooga, 5
- 138. Oceanside, CA, 12
- 139. **Santa Rosa, CA, 0**
- 140. Fort Lauderdale, 6
- 141. **Rancho Cucamonga, CA, 1**
- 142. **Ontario, CA, 1**
- 143. Port Saint Lucie, FL, 6
- 144. Vancouver, WA, 8
- 145. Tempe, AZ, 8
- 146. Springfield, MO, 15

- 147. **Lancaster, CA, 2**
- 148. Pembroke Pines, FL
- 149. Cape Coral, FL, 8
- 150. Eugene, OR, 14
- 151. Peoria, AZ, 7
- 152. Sioux Falls, SD, 10
- 153. **Salem, OR, 1**
- 154. **Corona, CA, 1**
- 155. Elk Grove, CA, 10
- 156. Palmdale, CA, 3
- 157. **Springfield, MA, 2**
- 158. Salinas, CA, 3
- 159. Pasadena, TX, 11
- 160. Rockford, IL, 5
- 161. **Pomona, CA, 1**
- 162. **Joliet, IL, 1**
- 163. **Fort Collins, CO, 0**
- 164. Torrance, CA, 3
- 165. Kansas City, KS, 9
- 166. **Paterson, NJ, 0**
- 167. **Hayward, CA, 1**
- 168. Escondido, CA, 5

- 169. **Bridgeport, CT, 0**
- 170. **Syracuse, 1**
- 171. **Lakewood, CO, 0**
- 172. **Alexandria, VA, 2**
- 173. Hollywood, FL, 11
- 174. **Naperville, IL, 1**
- 175. Mesquite, TX
- 176. **Sunnyvale, CA, 1**
- 177. **Dayton, 1**
- 178. Cary, NC, 3
- 179. Savannah, 16
- 180. **Orange, CA, 2**
- 181. **Pasadena, CA, 1**
- 182. Fullerton, CA, 3
- 183. Hampton, VA, 6
- 184. Clarksville, TN, 13
- 185. McKinney, TX, 3
- 186. **Warren, MI, 0**
- 187. McAllen, TX, 5
- 188. **West Valley City, UT, 2**
- 189. Columbia, SC, 16
- 190. Killeen, TX, 10
- 191. **Sterling Heights, MI, 1**

- 192. **New Haven, 1**
- 193. Topeka, KS
- 194. **Thousand Oaks, CA, 1**
- 195. Olathe, KS, 8
- 196. Cedar Rapids, IA, 23
- 197. Waco, TX, 7
- 198. Visalia, CA, 4
- 199. **Elizabeth, NJ, 0**
- 200. **Simi Valley, CA, 1**
- 201. Gainesville, FL, 5
- 202. Hartford, 4
- 203. Bellevue, WA, 11
- 204. Miramar, FL, 12
- 205. **Concord, CA, 2**
- 206. **Stamford, CT, 0**
- 207. Coral Springs, FL, 4
- 208. Charleston, SC,.18
- 209. **Carrollton, TX, 1**
- 210. Lafayette, LA, 10
- 211. Roseville, CA, 7
- 212. Thornton, CO, 6
- 213. Frisco, TX. 3

- 214. Kent, WA, 7
- 215. Surprise, AZ, 8
- 216. **Allentown, PA, 0**
- 217. Beaumont, TX, 17
- 218. **Santa Clarita, CA, 1**
- 219. Abilene, 17
- 220. Evansville, IN, 4
- 221. **Victorville, CA,. 1**
- 222. Independence, MO, 12
- 223. **Denton, TX, 0**
- 224. Springfield, IL, 11
- 225. **Vallejo, CA, 0**
- 226. Athens, GA, 5
- 227. **Provo, UT, 0**
- 228. Peoria, IL. 10
- 229. **Ann Arbor, 0**
- 230. **Lansing, MI, 1**
- 231. **El Monte, CA, 1**
- 232. Midland, TX, 17
- 233. **Berkeley, 0**
- 234. Norman, OK, 11
- 235. **Downey, CA, 1**

- 236. **Costa Mesa, CA, 1**
- 237. Murfreesboro, TN, 12
- 238. Inglewood, CA, 3
- 239. Columbia, MO, 4
- 240. Waterbury, CT, 8
- 241. Manchester, NH, 5
- 242. Miami Gardens, FL, 12
- 243. **Elgin, IL, 1**
- 244. Wilmington, NC, 22
- 245. Westminster, CO, 4
- 246. Rochester, MN, 7
- 247. Clearwater, FL, 21
- 248. **Lowell, MA, 2**
- 249. Pueblo, 6
- 250. **Arvada, CO, 2**
- 251. Ventura (aka San Buenaventura), CA, 5
- 252. Gresham, OR, 9
- 253. Fargo, 20
- 254. Carlsbad, CA, 9
- 255. **West Covina, CA, 1**
- 256. **Norwalk, CA, 1**
- 257. **Fairfield, CA**

- 258. **Cambridge, MA, 0**
- 259. Murrieta, CA, 3
- 260. Green Bay, 5
- 261. High Point, NC, 12
- 262. **West Jordan, UT, 2**
- 263. Billings, MT, 21
- 264. **Richmond, CA, 0**
- 265. Round Rock, TX, 9
- 266. Everett, WA, 8
- 267. **Burbank, CA, 1**
- 268. **Antioch, CA, 2**
- 269. Wichita Falls, TX
- 270. **Palm Beach, 1**
- 271. Centennial, CO, 5
- 272. Temecula, CA
- 273. Daly City, CA, 3
- 274. Odessa, TX, 14
- 275. Erie, 8
- 276. **Richardson, TX, 2**
- 277. Pompano Beach, FL, 5
- 278. **Flint, MI, 1**
- 279. South Bend, 5
- 280. West Palm Beach. 3

- 281. **El Cajon, CA, 2**
- 282. Davenport, IA, 14
- 283. **Rialto, CA, 0**
- 284. **Santa Maria, CA, 2**
- 285. Broken Arrow, OK, 10