

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of )  
 )  
REC Networks Petition for Rulemaking for ) RM-11909  
Improvements to the Low Power FM )  
(LPFM) Radio Service )

COMMENTS FROM THE  
NATIONAL FEDERATION OF COMMUNITY BROADCASTERS

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## Table of Contents

I.	Introduction and summary .....	3
II.	LPFM-250's potential for rural communities .....	4
III.	The Commission's longstanding commitment to media access for all Americans .....	5
IV.	Conclusion .....	6

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I. Introduction and summary

The National Federation of Community Broadcasters (NFCB) submits the following comments in support of the above-captioned Petition for Rulemaking, in which REC Networks proposes rule changes designed to expand the low power FM (LPFM) radio service.

Founded in 1975, NFCB is the oldest and largest national organization dedicated to noncommercial educational licensees serving as community access and education points within the public media system. NFCB is committed to enhancing collective impact among licensees devoted to community service and leading initiatives that contribute to innovation in noncommercial radio service. Today, NFCB's noncommercial educational member radio stations are majority rural. Furthermore, NFCB's member base is strongly rooted among LPFM radio stations.

NFCB believes the REC Networks Petition for Rulemaking is a valuable step in expanding LPFM service nationwide. In its work in the noncommercial educational radio system and in direct services to LPFM stations, NFCB has served a leading role in reflecting

the important role LPFM stations play in rural communities. The rural media environment has distinctive challenges. Local newspapers in rural regions are vanishing at an alarming rate. Noncommercial educational radio provides emergency response information critical to public health and safety, as well as offers help to fill the information gaps these areas might experience. These rural communities are the most likely beneficiaries of the REC Networks Petition for Rulemaking, since power increases would be untenable in virtually all urban areas.

## II. LPFM-250's potential for rural communities

The REC Networks Petition for Rulemaking proposes a simple structure. In it, the FCC would add a second class of service of LPFM for a 250 watt at 30-meter height above average terrain (HAAT) service. For many communities, this could mean that LPFM stations would be able to serve a geographic area greater than under four miles, which is what has traditionally been associated with LPFM.

Since its creation in 2000, LPFM has long been upheld as an opportunity for hyperlocal broadcasting in communities nationwide. However, it is important to appraise what hyperlocal means in rural communities. Currently, the Census nor the Office of Management and Budget do not clearly define rural. However, population density is a major factor. The Department of Agriculture points out some of these discrepancies, remarking that nonmetro and noncore areas inform our understanding<sup>1</sup>, but do not paint a complete picture. A more precise snapshot comes if we consider rural areas' vast open land and with population densities of less than 500 people per square mile, as well as places with fewer than 2,500 people. Radio, in these areas, is essential for public safety.

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<sup>1</sup> <https://www.ers.usda.gov/topics/rural-economy-population/rural-classifications/what-is-rural.aspx>

Raising the power ceiling would help many LPFM radio stations to serve their communities with a more reliable, and easy to use radio service. A limited signal for an LPFM in a remote area presents a variety of challenges. Not only is educational programming harder to access, information in the event of wildfires and other natural disasters is crucial. Such a change via the REC Networks Petition for Rulemaking, particularly in rural areas, would have a negligible effect on other stations. Being limited to 250 watts should assure other broadcasters, many with translators operating at that same power level, that they can continue to provide a reliable service to their audiences without issue. In rare instances of conflict, such can easily be resolved quickly upon occurrence.

For rural communities, LPFM is an important service. The REC Networks Petition for Rulemaking in effect amplifies and strengthens radio's reach in rural areas. Emergency response services, educational programming and needed civic information will be able to reach far greater numbers in regions that most need this service. Moreover, the REC Networks Petition for Rulemaking largely does not affect already saturated markets.

III. The Commission's longstanding commitment to media access for all Americans

NFCB acknowledges this Petition for Rulemaking may have effects that do not cover every station. Many LPFM stations will not get to upgrade. Concerns about the interference impact of increased-power LPFM stations on neighboring stations should be investigated further. However, NFCB believes these matters should not halt the REC Networks Petition for Rulemaking. NFCB trusts the Commission can assess these matters as it considers an increase of LPFM stations' maximum power to 250 watts.

While the Commission cannot repair every media gap, leadership has long sought to ensure the most robust media access is available to all Americans. NFCB believes the

Commission can help radio to meet the needs of audiences in rural communities especially. Many counties without adequate noncommercial educational radio coverage could see enhanced emergency support through approval of the REC Networks Petition for Rulemaking.

#### IV. Conclusion

NFCB contends that media options in rural communities are dwindling. A persistent gap in broadband in rural areas, as noted by the Pew Research Center<sup>2</sup>, means the fallbacks urban communities have relied on, such as streaming services and online platforms, remain out of reach for broad areas of rural America. In such moments, institutional mediums such as radio hold a position of credibility and value that cannot be overstated. Noncommercial educational radio is critical in providing educational content in regions where resources are greatly needed.

NFCB believes the REC Networks Petition for Rulemaking provides a necessary method for expanding LPFM radio service and, by extension, emergency response coverage and educational content to rural communities.

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<sup>2</sup> <https://www.pewresearch.org/fact-tank/2019/05/31/digital-gap-between-rural-and-nonrural-america-persists/>