

Keys, LaKeshia

From: Susan Raybuck [summerintx@verizon.net]
Sent: Sunday, May 13, 2012 11:38 PM
To: crb
Subject: Docket No. 2011-2 CRB NCEB II: "Determination of Reasonable Rates and Terms for Non-Commercial Broadcasting"

Honorable Judges,

The proposed lowest tier or Royalty Rates is for stations serving a population of less than 249,000 people. I am one of those working to get a new license for an LPFM station in a rural area. Our population in Wimberley, Texas is around 9,000 people. It would place an enormous burden on a station of our size to have to pay royalties at the same rate as a station in a much larger community. The burden could make it enormously difficult to get on the air or stay on the air.

We are a non-profit that formed in the aftermath of the fires Central Texas endured last September. We realized then that we had no way to alert citizens and save lives in case of an emergency and that our volunteer fire department would have enormous difficulty in going door to door to get people to evacuate in our rural and wooded area. Radio is a relatively affordable way to spread information quickly and save lives. We realized we're too far from the nearest city media market (Austin) to get timely coverage of our emergencies. If we are to save lives, we must have better ways than we currently do.

We want our radio station to provide a full spectrum of news, emergency, health, and wellness information, provide a community calendar of events, support local music and musicians, and to be a means of educating our young people and other interested people in the community in both the technical and communication skills involved in producing radio. But we will want to be able to play other music as well, because there isn't enough local musical talent to fill all the time slots even though we have a lot of talent for a town our size.

We will have ongoing fundraising to first get the station off the ground and then to keep it on the air. With such a small population, we won't have the same financial ability to pay as the station in a city of 249,000 would. The proposed tier cutoff of a market of 249,000 is too high a bar. Please add another tier that is more affordable for stations in markets of less than 25,000. That would be an enormous help. It seems to me to be an inherently unfair expectation to lump us in with these much larger markets and quite the opposite of reasonable to set rates for our market at the same level as a market of almost a quarter of a million people.

Sincerely,
[Susan Raybuck, Board President](mailto:summerintx@verizon.net)
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