

Transfer of Licenses

1. How is your current board structured?
2. Where do board members live?
3. How do sudden changes in a majority of your board most often occur?
4. Should the rules be amended to permit transfer of control of LPFM Licensee entities (and end the return of licenses to the Commission)?
5. Do you think something should be given in exchange to the license holder for transferring a license? (This is currently prohibited). This could be money, or other things of value.
6. Should there be a ?holding period? during which a station cannot be sold?
7. If stations are allowed to be sold, should the amount of the sale be restricted to the licensee?s legitimate and prudent expenses?
8. Should eligibility for LPFM licenses be permanently restricted to local entities?
9. Should multiple ownership of LPFM stations be permanently restricted? If so, how should assignments and transfers be restricted?
10. What procedures should be put in place to ensure the integrity of the transfer or assignment process?
11. What procedures should be put in place to ensure the promotion of local service?
12. Do you think blanket guidelines are adequate for the transfer of control or assignment of LPFM stations, or should the Commission give its Media Bureau the authority to review proposed transfers and assignments on a case-by-case basis?
13. How should LPFM permittees and licensees request approval for, or report transfers of control?
14. For LPFM licensees with a traditional corporate organizational structure, should the Commission?s rules governing transfers of control of stock corporations apply? (Under the proposal in the Non-Stock Transfer NOI, a sudden change in a majority of the governing board of a membership organization or governmental entity would be considered an insubstantial transfer of control, subject to a modified ?short form? consent procedure, including the filing of an FCC Form 316. Should this apply and why?)

Applications

1. How often should an application "window," or time period to apply for licensure, be opened?
2. Has your station needed a channel change amendment? When?
3. How many hours per day does your station operate?
4. Is the production of your programming within 10 miles of the coordinates of your proposed transmitting antenna? If not, why not (See III A 9)?
5. Do you receive programming via satellite? If so, how much of your programming comes from satellite for retransmission?
6. How often has your station filed "minor change" applications with the Commission? (a minor change can be a transmitter site relocation of less than two kilometers for an LP100 station, or a relocation of less than one kilometer for an LP10 station. Minor change applications may also propose a change to an adjacent or IF frequency or, upon a technical showing of reduced interference, to any other frequency. PRP is asking the Commission to alter the definition of a minor change to include transmitter relocation of up to 5.6 km instead of 2 km for LP100 licenses.)
7. How often has your station filed "minor amendments" to a pending application?
8. Should the 30-day deadline for time-sharing applications be extended to 90 days?
9. How should time-sharing renewals be handled?

Translators

1. What priority should LPFM applicants be given over translator applicants? Should only local applicants be able to apply for translators?
2. Under what conditions LPFM applications should be treated as having "primary" status to prior-filed FM translator applications and authorized FM translator stations.
3. Should all LPFM applications have primary status because LPFM stations are permitted to originate local programming?
4. Should primary status be limited to LPFM applicants that pledge to originate locally at least eight hours of programming per day?
5. Should the Commission provide "grandfathered" protection rights to certain classes of FM translators?
6. Should the Commission dismiss all pending applications for new FM translator stations and make potential refilings subject to the resolution of the licensing issues raised in this

proceeding?

7. Should the Commission dismiss the pending mutually exclusive FM translator applications?

Encroachment

1. Should an LPFM station be permitted to continue to operate even when interference is predicted to occur within the 70 dBu contour of an -encroaching- second- or third-adjacent channel full service station?

2. Should an LPFM station be permitted to remain on the air if the area of predicted interference does not receive service from the full service station prior to the grant of a construction permit for a new station or facilities modification of an existing station?

3. Should the LPFM station be permitted to remain on the air if the full service station's community of license would not be subject to predicted interference?

4. It is always the case that an -encroachment- issue involves the licensing of a subsequently filed full service station application. As such, would an amendment to Section 73.809 be consistent with Congress's directive barring the reduction of third-adjacent channel distance separations for low-power FM radio stations?

Other Issues

1. Do you feel that an 18-month construction permit is long enough to accomplish construction?

2. If you don't feel 18 months is long enough, why not? Describe your situation.

3. The Commission has proposed to extend the LPFM construction period to three years. Do you feel this is adequate?

4. In the case of timeshares, should time-sharing applicants submit minor amendments to relocate the transmitter to a central location, despite the site relocation limits currently in existence?

5. Comments on Initial Regulatory Flexibility Analysis (IRFA)?