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August 8, 2005

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**RE: MM Docket No. 99-25**

Dear Ms. Dortch:

**Licensee Santa Monica Community College District (SMCCD) Responds to Further Notice of Proposed Rulemaking concerning Section 73.809, LPFM stations and FM translator stations.**

### **EXECUTIVE SUMMARY**

**Santa Monica Community College District (SMCCD)** maintains seven translator stations to extend the signals of Southern California stations **KCRW**, **KCRU**, **KCRI** and **KCRY**. Three of these translators provide the communities with sole public radio service.

We also feed a community-owned translator in the small desert city of **Ridgecrest**, 140 miles North East of Los Angeles. The Navy's top rated research and development facility, China Lake, is located nearby. Contributions to maintain and operate a series of TV and FM translators, including the translator that rebroadcasts KCRY's signal, are voluntary. Residents also volunteer their time to keep the operations going.

We also hold a construction permit for a translator in **Borrego Springs** which is to be fed off air via KCRI, Indio.

**KCRW**, a community service of Santa Monica College, provides more than 550,000 listeners each week with an eclectic schedule of news, locally and nationally produced music, public affairs, political analysis and cultural programs. As a member-supported, non-commercial station, its 55,000 subscribers provide KCRW with the largest single source of financial support. KCRW's programming reflects the diversity of the community it serves. KCRW is National Public Radio's Southern California flagship station. KCRW also produces six national programs and award-winning literary and drama programs from its studios on campus in Santa Monica.

KCRW's innovative and acclaimed programming has been recognized with significant press coverage in Los Angeles and around the country and the world. *The New York Times* recently hailed Nic Harcourt, KCRW's music director, as

the most influential DJ in radio. With 22 local programs available for podcasting, KCRW is a recognized leader in new technologies.

Nonetheless, KCRW considers its key role as that of a public service broadcaster. It values all its listeners, whether they listen on full service stations or low power translators.

**The licensee believes that if the FCC elevates the status of Low Power FM stations to a primary status in relation to translator stations, that would mean that any LPFM station could displace any translator station.**

**That could result in listeners to KCRW's program service in small, rural communities losing their translator, including the individual listener's voluntary financial investment to support the service.**

## **Details of SMCCD's Translator Service**

KCRU, Oxnard, KCRI, Indio and KCRY, Mojave originally began as translator stations establishing a listener base which could support and warrant the upgrade to primary station status. Three of the translators serve communities with no public radio service.

One of the seven operates as an LMA translator. This service was established in 2004 to serve an audience located beyond KCRU's protected signal contour. This audience had previously been listening to KCRU's signal for more than 10 years. KCRU's signal now receives interference from a second channel adjacent station's IBOC signal in this area.

SMCCD often receives calls from former listeners who relocated into neighboring parts of Southern California requesting that we serve their area. We continuously explore the option of using translators to serve these areas. It would be highly detrimental both to our existing service and our ability to serve future audiences if LPFM stations were granted primary status over translators.

Based on our experience in Goleta, it's possible that audiences now listening to our secondary service could be affected in the future by adjacent stations adding

IBOC transmitters. We would then have to add more translators to reach the same audience, if we could find an available frequency.

Although we do not originate any local programs on any of the translators, our morning and afternoon newscast reporters are instructed to file stories on significant news from these areas. When significant cultural events occur, such as the Ojai Music Festival, these are listed on both our on-air calendar and on our website.

**Any interruption to our present service will have a negative effect on our financial operations. If we were forced to shut down any of our translators, it is doubtful we could find a replacement frequency in the crowded spectrum space of Southern California.**

### **Satellite Service**

KCRW operates a KU satellite stream to feed several of its translators and distant stations. The system was put in place in 1994 as a means to feed KCR1, Indio, as a cost effective method to provide a studio to transmitter link. Once in place, the foot print of the satellite service enabled KCRW to leverage its investment to serve difficult to feed sites. Gorman and Twenty Nine Palms

represent two communities who would not be serviced if not for the satellite delivery of programming. Likewise over the air fed translators in Ridgecrest and Borrego Springs (when built) depend on the over the air signals of KCRI and KCRY, both of which are fed via the same satellite stream. Satellite fed translators afford us a very cost effective and reliable method of serving communities which otherwise would be not be served.

The following is a listing of SMCCD's translators with a brief summary of operations, population, and contributors to KCRW:

**K209CN**

**Gorman, CA**

Constructed March 1999

Satellite Delivered programming of KCRW

Population: **400**

(zip codes: 93243, 93225, 93222, 91310, 39532, 91384, 93040, 91354, 91383, 91350, 91380)

The service area is a rural area. There are only a few radio signals that serve these communities.

Number of contributors, past and present: **627**

Sole Public Radio service to this community; .KCRW is the sole provider for the

NPR News magazines

## **K210CL**

### **Lemon Grove, CA**

Acquired October 2001

Satellite Delivered programming of KCRW

Population: **24,935**

(zip codes: 91913, 91914, 91902, 91908, 92139, 91910, 91921, 91947, 91915, 91911, 91909, 91912)

Number of KCRW contributors, past and present: **36**

If we were forced to shut this translator down, it is doubtful we could find a replacement frequency in the crowded spectrum space of Southern California.

## **K214CR**

### **Joshua Tree & Twenty Nine Palms, CA**

Constructed March, 1998

Satellite Delivered programming of KCRW

Population: Joshua Tree, **3,898**. Twenty Nine Palms, **14,764**.

(zip codes: 92278, 92252, 92277, 92284, 92285, 92286, 92268)

The service area is a rural area. There are only a few radio signals that serve these communities.

Number of contributors, past and present: **316**

Sole Public Radio service to this community; KCRW is the sole provider for the

NPR News magazines in this coverage area.

## **K215BA**

### **Cabazon & Beaumont, CA**

Fed over the air from KCRW, Santa Monica 89.9 FM

Constructed October, 1986

Population: Beaumont **9,685**

Cabazon **1,588** The service area is a rural area. There are only a few radio signals that serve these communities.

(zipcodes 92220, 92230, 92256, 92223, 92583, 92581, 92582, 92546, 92543, 92549, 92268, 92545, 92320, 92286, 92241, 92551, 92552, 92567)

Number of KCRW contributors, past and present: **302**

## **K271AC**

### **Ojai, CA**

Fed over the air from KCRU, Oxnard 89.1 FM

Constructed March 1997

Population: Ojai 7,613. The service area is a rural area. There are only a few radio signals that serve these communities.

(zipcodes 93022, 93023, 93024)

Number of KCRW contributors, past and present: **892**



## **K272DI**

### **Fillmore and Santa Paula, CA**

Fed over the air from KCRU, Oxnard 89.1 FM

Population: Santa Paula, 28,879. The service area is a rural area.

(zipcodes 93061, 93060, 93066, 93010, 93015, 93011, 93012, 93004, 93016, 93021, 93090, 93030, 93003, 91320, 93034, 93031, 93032, 91319, 91360, 91363, 93033, 93001, 93041, 93035, 93024, 93023, 93062, 93043, 93009, 93007, 93005, 93002, 93006, 91362, 93044, 93040, 93022, 93042, 91359, 91358, 93065, 93094, 93093, 91361)

Number of contributors, past and present: **5142**

## **K295AH**

### **Goleta, CA**

Fed over the air from KCRU, Oxnard 89.1 FM

Population: **55,000**, a metropolitan area (zip codes 93111, 93199, 93116, 93118, 93107, 93110, 93105, 93109, 93101, 93102, 93190, 93160, 93150, 93140, 93130, 93121, 93120, 93106, 93103, 93108)

Number of contributors, past and present: **1,619**

## **K261AC**

### **Ridgecrest, CA**

Fed over the air from KCRY, Mojave.

Population: **25,000** (zip codes 93555, 93556, 93558, 93527)

Number of contributors to KCRW, past and present: **301**

Many of these KCRW members also contribute to the Indian Wells Valley TV Booster (IWVTVB), a not-for-profit volunteer organization that has been receiving, translating, and re-broadcasting TV and FM radio stations' signals to the IWV since about 1950. Today, many valley residents continue to support the IWVTVB so that those without satellite or cable service can receive TV and FM radio over the air. The Booster's equipment is bought and maintained with funds donated by residents of the IWV. Other residents donate their time and services to keep the equipment operating and to make improvements.

Sincerely,

Will Lewis, Management Consultant  
KCRW/Santa Monica Community College District