

Keys, LaKeshia

From: Todd Urick [todd@commonfrequency.org]
Sent: Saturday, May 26, 2012 1:21 AM
To: crb
Subject: Re: Docket No 2011-2 CRB NCEB II

Dear Copyright Royalty Judges:

It has come to our attention that the CRB is accepting comment regarding the proposed rates and terms for noncommercial broadcast. Specifically, our concern is over the lowest tier of royalty rates for stations serving a population of less than 249,000 people. Our nonprofit, Common Frequency, assists organizations in media-deprived areas obtain local volunteer-run non-commercial community radio facilities.

Many of these stations serve hundreds to a few thousand people. One station we recently licensed and are assisting is a new FM station that serves a Native American community that has a population of 800 people. If the rate is \$4,000 year, we would be unable to collect the \$5 per person in this economically downtrodden town to continue running the radio service. The radio service is essential as reliable internet is not fully available there.

\$5 per person for 800 people is substantially different than 1.6 cents per person if serving 249,000 people--it's 312.5 times more per person. For that reason we believe a fairer metering should be sought for the lowest tier.

Respectfully,
Todd Urick

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