

Before the
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in the Library of Congress
Washington, D.C. 20559

In re)
)
Notice of Proposed Rulemaking) RM 2008-7
)
NOTICE AND RECORDKEEPING FOR USE OF)
SOUND RECORDINGS UNDER STATUTORY)
LICENSE)
_____)

**COMMENTS OF POTENTIAL WEBCAST RADIO STATION,
JOHNSON COUNTY COMMUNITY COLLEGE**

As early as the college's inception in 1969, Johnson County Community College in Overland Park, Kansas, considered a radio station. But it was a new school, and this activity would take too much time and resources. So, JCCC progressed through decades without a radio station. Attempts to even consider such a venture were scuttled quickly when researchers discovered the costs involved and the lack of an available FM signal in the already-crowded Kansas City market.

When broadcasting over the Internet became a reality, college personnel again researched the feasibility of starting a station. Webcasting seemed to be an ideal way to start a station. Costs were fewer, and students warmed to the idea. Anne Christiansen-Bullers, adviser to the student newspaper, wrote a proposal in Fall 2007 to start a station in Fall 2009. Currently, the project is in the budget and remodeling phase, and all indications point to a launch date of August 17, 2009. The station will be staffed by students, for students, with a mixture of news, talk, music and live events.

The station of Johnson County Community College, as yet unnamed as of the date of this report, hereby submits comments in the above captioned proceeding. The JCCC station, set for launch in August 2009, will be student staffed, non-commercial, non-profit web station on the campus of Johnson County College, 12345 College Blvd., Overland Park, Kansas, a suburb of Kansas City. Our initial intent is to forego AM, FM or satellite broadcast in favor of exclusive webcasting. We are an interested party because the proposed rule changes will affect the way in which we operate and may potentially affect the future of our launch.

These comments are being submitted because we budgeted for paying the minimum fee, and the proposed changes concerning census reporting and the requirement to report actual performances in lieu of ATH is an undue burden on an emerging station. We move that a college station like ours should be exempt from the proposed changes.

If the proposed changes are ratified, it will greatly affect the programming on our station and may indeed threaten its future. Both the students and the adviser will be new to the streaming world, and the log system currently being suggested might prove so cumbersome as to eliminate music of any kind on the station. Without music, many students will not want to work for the station, and many more will not want to tune in, which in turn will seriously diminish the learning opportunity and the overall reach of the station. How will we report actual performances for songs only, when we also plan to produce news, interview shows, PSAs and calendar announcements? No technology that we know exists can log, down the second, how many listeners are tuned into a web station for each song. Therefore, demanding such information as a means of deciding payment would create a multiple problems, and the result may be a lack of music in programming.

Our institutional technology department is already being stretched to its limits with the demands of credit education, continuing education, an on-site business development center and a high-profile art gallery and technology center. They cannot provide for us a method to log listeners such as the proposal states.

We plan to join College Broadcasters, Inc. in 2009, and we stand behind their recommendations, just as we will seek out CBI to provide leadership and experience as we begin our new venture.

It is our hope that burdensome rules and regulations do not derail our plans for a web radio station. Johnson County Community College has been waiting for 40 years for a “voice” for its students, and any simplification of rules and reportage will help us as we begin the infancy of our venture.

Respectfully submitted,

Potential Webcast Radio Station of Johnson County
Community College, Overland Park, KS

By: _

A handwritten signature in black ink that reads "Anne Christiansen-Bullers". The signature is written in a cursive style with a horizontal line underneath it.

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