

*Before the*  
**FEDERAL COMMUNICATIONS COMMISSION**  
**Washington, DC 20554**

In the Matter of )  
 )  
Recommendations of the Independent Panel ) EB Docket No. 06-119  
Reviewing the Impact of Hurricane Katrina )  
on Communications Networks )

**COMMENTS OF PROMETHEUS RADIO PROJECT**

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These comments are respectfully submitted by Prometheus Radio Project<sup>1</sup> (“Prometheus”) in response to the Commission’s *Notice of Proposed Rulemaking, Recommendations of the Independent Panel Reviewing the Impact of Hurricane Katrina on Communications Networks*. 21 FCC Rcd 7320 (2006) (“*NPRM*”). Prometheus seeks to aid the Commission in achieving its goal of “strengthen[ing] and improv[ing] response and recovery efforts.” *NPRM* at ¶ 6. Prometheus highlights the positive impact that Low Power FM (“LPFM”) radio stations have on relief efforts during and after a disaster, and also discusses how the recommendations of the Independent Panel Reviewing the Impact of Hurricane Katrina on Communications Networks (“Independent Panel”) affect LPFMs.

**SUMMARY**

First, Prometheus commends the Commission’s work over the past year in responding to the devastation wreaked by Hurricane Katrina in late August and September of 2005. From providing effective leadership in the days and weeks following Katrina, to convening the Independent Panel, and finally, to commencing this Rulemaking, the Commission has demonstrated its commitment to

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<sup>1</sup> Prometheus Radio Project is a non-profit organization founded in 1998 by a group of media activists to promote community radio. Prometheus’s primary focus is on creating a vibrant community of LPFM stations and listeners, which it does by assisting the building of radio stations and by sponsoring events that promote awareness and support for LPFM radio. Prometheus aided post-Katrina relief efforts by working to reestablish vital radio communications in the disaster areas.

ensuring that our Nation's communications systems are fully functional in times of disaster.

Prometheus lends its full support to the Independent Panel's recommendations; in so doing, it highlights the manner in which LPFMs can and will comply with the Panel's recommendations. While all of the Independent Panel's suggestions are constructive, this Comment focuses on those suggestions that will have the greatest effect on the LPFM community: sector-wide readiness checklists and business continuity plans, waivers of regulatory requirements and Special Temporary Authority ("STA"), and emergency communications to the public.

The benefits of a robust LPFM service to disaster relief efforts provide a strong justification for allowing more LPFMs onto the airwaves. Currently underway at the Commission is an LPFM rulemaking which seeks to "maximize the value" of the service. *Second Order on Reconsideration and Further Notice of Proposed Rulemaking, Creation of a Low Power Radio Service*, 20 FCC Rcd 6763 at ¶ 1 (2005); *see also Notice of Proposed Rulemaking, Creation of a Low Power Radio Service*, 14 FCC Rcd 2471 (1999). The experience of Hurricane Katrina illustrates one of the most valuable aspects of LPFMs: their ability to provide effective communications assistance to local communities in the wake of a disaster. In addition to providing vital, life-saving information tailored to local circumstances, LPFMs are able to reach niche communities, particularly non-English speaking ones, and their strong community ties act as an incentive for providing thorough and effective assistance.

Expansion of the LPFM service will ensure that communities across America reap the benefits of community radio, not only on a day-to-day basis, but more importantly, in the event of catastrophe. By resolving the LPFM rulemaking in a manner that allows the service to expand, the Commission will thus further the Independent Panel's goal to strengthen and improve disaster response and recovery efforts by creating new, effective outlets for emergency communications.

The narratives of the LPFM stations that aided communities affected by Hurricane Katrina serve as compelling evidence of the power of community radio. These stations went to extraordinary lengths to ensure that the public received important communications, from tornado warnings to information about where to find food and shelter. A summary of these narratives is attached as Appendix A, which provides a glimpse of the tangible benefits that LPFM stations bring to the communities they serve.

### **ARGUMENT**

The Commission established the LPFM service in 2000 in order to “create a class of radio stations designed to serve very localized communities or underrepresented groups in communities.” *Report and Order, Creation of a Low Power Radio Service*, 15 FCC Rcd 2205 at ¶ 4 (2000). In the years since, LPFMs have proven capable of providing vitally important services in times of disaster, and the stories of LPFMs that provided assistance during Hurricane Katrina demonstrate the powerful and beneficial role that such stations play in their communities.<sup>2</sup> The Independent Panel’s recommendations for promoting “more effective, efficient response and recovery efforts, as well as heightened readiness and preparedness in the future,” *NPRM* at ¶ 1, present the opportunity to further improve the ability of LPFMs to aid their communities during and after a disaster.

The Independent Panel’s recommendations regarding pre-positioning and emergency communications to the public will be particularly beneficial to the ability of LPFMs to provide disaster and emergency assistance. Additionally, because these recommendations are not unduly burdensome, LPFMs will be able to comply with them, and the recommendations of the Independent Panel will apply equally well to LPFMs regardless of the type of disaster at issue. Prometheus thus supports these additional obligations for public services and urges the Commission to adopt the Independent

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<sup>2</sup> See Appendix A.

Panel's recommendations in the realms discussed in this Comment.

Finally, Prometheus requests that the Commission resolve the LPFM rulemaking in a manner that allows the service to expand. Doing so will help achieve the goals of the Independent Panel in making sure the public receives effective emergency communications during crises.

## **I. THE COMMISSION SHOULD PROMULGATE RULES THAT IMPROVE PRE-POSITIONING FOR DISASTERS.**

As an initial matter, any pre-positioning that can be done to strengthen infrastructure is vitally important to the ability of LPFMs and others to broadcast in the wake of a disaster. However, Prometheus specifically urges the Commission to implement the recommendations for readiness checklists, broad business continuity plans, and automatically waiving regulatory requirements and granting STA in certain circumstances. These recommendations will allow LPFMs to improve their disaster communications to the public.

### **(A) LPFM Stations and Their Communities Will Benefit From Sector-Wide Readiness Checklists.**

The Independent Panel recommends that a readiness checklist be developed for the communications industry, which would include developing formal business continuity plans, conducting training exercises, developing suitable plans and procedures, and maintaining pre-positioned supplies and equipment to help disaster response efforts. *NPRM* at ¶ 8. Prometheus fully supports sector-wide readiness checklists. These checklists will provide important guidance to LPFM stations that otherwise might not have disaster plans in place, thus ultimately allowing LPFMs to serve their communities with improved efficacy.

Additionally, assuming the checklist is devised by an outside working group (whether it be an industry consensus group or some other entity) and then disseminated to individual stations, the

resources of LPFMs will not be overburdened by this recommendation. Rather, the station and the communities they serve will benefit from having a set of guidelines, devised by those familiar with disaster response, to rely on in the event of a catastrophe. Many LPFM broadcasters have demonstrated their ability to think on their feet and under considerable pressure when disasters strike<sup>3</sup> and this recommendation provides even more support and guidance for such stations, which will only improve relief efforts in the future.

**(B) Broad Business Continuity Plans Will Aid LPFMs in Providing Community Assistance.**

The *NPRM* calls for comments on the appropriate breadth of business continuity plans and whether the suggested elements are adequate. *NPRM* at ¶ 8. The Independent Panel recommends that business continuity plans, at a minimum, address: power reserves; cache of essential replacement equipment; adequate sparing levels; credentialing; Emergency Operation Center (“EOC”) coordination; training/disaster drills; and appropriate disaster preparedness checklists. *Recommendations of the Independent Panel Reviewing the Impact of Hurricane Katrina on Communications Networks*, 21 FCC Rcd 7320 at 31 (“*Report*”).

Of these recommendations, Prometheus particularly supports EOC coordination, disaster drills, and disaster preparedness checklists, as these will provide adequate emergency preparation for LPFMs. Facilitating EOC-LPFM coordination is especially important, since strong ties between these two community-based organizations will enable critical emergency information to be disseminated to the community in an effective manner. Additional recommendations for conducting exercises to evaluate emergency plans and train personnel, identifying “key players” and means of contacting them, and

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<sup>3</sup> See, e.g., [Appendix A](#) (describing the story of Brice Phillips of WQRZ, Bay St. Louis, Mississippi).

archiving critical system backups will also be beneficial. *See Report* at 31. Finally, Prometheus supports the recommendation of maintaining a cache of replacement equipment, but requests that the Commission allow adequate time for compliance. Like all broadcasters, LPFMs have a strong interest in developing contingency supplies, but it may take them more time than others to raise the necessary funds. Thus, the time-frame for compliance should take this into consideration.

Combining these recommendations into a strategic plan to help stations get or stay on the air during a disaster will enable LPFMs to more effectively serve their communities by allowing them to focus on transmitting important information, rather than on operations. Because of these benefits, and because the burden of compliance for LPFMs will be minimal, Prometheus supports the recommendations for business continuity plans.

**(C) Rules Automatically Waiving Regulatory Requirements and Granting Special Temporary Authority Should be Utilized for Restoring Communications in Disaster Areas.**

The Commission's efforts to provide regulatory waivers and STA to LPFMs in the aftermath of Hurricane Katrina proved immensely beneficial to the affected regions, as in some cases these stations were the primary or only source of emergency information to the public.<sup>4</sup> The benefits produced by these LPFMs provide compelling evidence in support of establishing a prioritized system of automatically waiving certain regulatory requirements and of granting automatic STA. *NPRM* at ¶ 9. A primary benefit of granting such relief comes from the strong ties between LPFM stations and their community of license. Because LPFMs are locally-based and invested in their communities, there is great incentive for them to aid local disaster relief efforts, and waiver of requirements and STA will further encourage such activity.

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<sup>4</sup> *See Appendix A.*

Communities struck by disaster will also benefit from the provision of clear, accurate, and timely information. By automatically waiving regulatory requirements and granting STA, the Commission will alleviate some of the burdens on LPFMs and other broadcasters who are operating under catastrophic conditions, thus allowing them to focus on providing information to the public. Such rules will also eliminate disincentives to broadcasting during disasters, such as worries about potential regulatory violations. This is of great benefit to LPFMs, which often have small operating budgets and thus are likely to feel harsh effects of rule violations.

The Independent Panel specifically recommends that the Commission explore automatic grants of STA when a geographic area is declared a “disaster area” by the President, and that as a condition of waiver, the Commission “require verbal or written notification to Commission staff contemporaneously with activation or promptly after the fact.” *Report* at 32. It is further recommended that the Commission “examine expanding the on-line filing opportunities for STA requests.” *Id.* Prometheus supports both recommendations. Knowing that STA vests automatically when the President declares a disaster area will enable LPFMs to act quickly and without bureaucratic hassle. Verbal or written notification would not be an onerous requirement and would aid the Commission’s oversight efforts in ensuring that the public is receiving emergency information. Additionally, the ability to submit STA applications online would also ease the burden of the application process.

The Commission should also consider granting STA authorizations to broadcast in new communities. This temporary status would allow LPFM stations to disseminate information to a larger number of citizens when other resources are unavailable. The success of the LPFM stations set up outside the Houston Astrodome and on ships docked outside of New Orleans demonstrate the benefits that

can be reaped by providing temporary authorizations.<sup>5</sup> Each of these stations was able to provide vital information to individuals affected by Hurricanes Katrina and Rita, in addition to helping disaster relief agencies with coordination. Further, because these stations were set up locally for the sole purpose of aiding the affected community, they were able to tailor their broadcasts to the specific circumstances of each area. The Commission should take full advantage of the willingness of volunteers to set up emergency low power broadcasts by amending the rules to allow for temporary authorization to do so.

Prometheus specifically urges the Commission to adopt the following waiver recommendations of the Independent Panel: waiver of non-commercial educational (“NCE”) rules to permit NCE television and radio stations in the affected area to simulcast and rebroadcast commercial station programming during a crisis; waiver of requirements notifying the FCC of use of emergency antennas within 24 hours; waiver of rules on limited and discontinued operations; tolling of broadcast station construction deadlines; automatic STAs or STAs granted through written or oral notification, for broadcast stations to go silent; waiver of restrictions on simulcast programming of commonly owned stations within the same band; waiver of location and staffing requirements of a main studio within the community; and waiver of activation and post-event Section 73.1250 reporting requirements related to transmission of point-to-point communications during a declared emergency. *Report* at 33. Prometheus also recommends that the Commission implement an expedited process for increasing LPFM stations’ power and frequency range when they are the sole source or one of just a few sources of radio broadcasts in the disaster area.

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<sup>5</sup> See Appendix A (describing the stories of the Houston Astrodome LPFM station, Radio Hope, and Radio Mercy).

## **II. THE COMMISSION SHOULD ADOPT RULES THAT ENABLE LPFMs TO PROVIDE MORE EFFECTIVE EMERGENCY COMMUNICATIONS TO THE PUBLIC.**

Hurricane Katrina demonstrated the necessity of disseminating accurate and timely information to the public. However, having a functional infrastructure in place to broadcast emergency information is not enough. In addition, emergency communications must be made in an effective manner and must be capable of reaching all citizens. Prometheus supports the recommendations by the Independent Panel regarding facilitating and complementing the use of the existing Emergency Alert System (“EAS”) and specifically urges the Commission to take steps to publicize EAS, reach non-English speaking Americans, and ensure consistent and reliable emergency information through a consolidated and coordinated public information program. *See Report* at 40-41.

### **(A) EAS Must be Utilized Effectively by State and Local Personnel and Its Messages Must Reach All Americans.**

A functional infrastructure is not enough to ensure effective emergency communications; rather, the manner in which information is disseminated must also be considered. EAS is used to transmit messages from the President in the event of a national emergency and is also used by state and local entities to transmit emergency information. “The Emergency Alert System (EAS): FCC Consumer Facts” *available at* [www.fcc.gov/cgb/consumerfacts.eas.html](http://www.fcc.gov/cgb/consumerfacts.eas.html) (last visited July 27, 2006). LPFMs present an effective mode of delivery for these alerts, as they often reach niche communities, particularly non-English speaking ones. By facilitating better use of EAS by LPFM stations, the Commission can ensure greater effectiveness in communicating emergency information to the public. Publicizing EAS and educating the public, as well as state and local personnel, about its use is an important part of ensuring that disaster information is received by all those who need it. Additionally, such individuals should be made aware of the ability of LPFMs to broadcast EAS notifications.

Prometheus thus encourages the Commission to promote the use of EAS by LPFMs and to ensure public awareness of such resources.

As the Independent Panel found, the lack of EAS activation at the state and local levels during Hurricane Katrina resulted in the dissemination of “inconsistent or erroneous information” to citizens within the affected areas. *Report* at ii. Additionally, there was no use of the system to provide “localized emergency evacuation and other important information.” *Id.* Providing better awareness and information about EAS to all those involved in emergency communications to the public—from government officials to broadcasters—will ensure that these organizations and individuals are able to effectively activate important emergency alerts.

Prometheus also supports the Independent Panel in its recommendation that best practices be created and publicized for serving those with disabilities and non-English speakers. LPFMs are already set up, in many communities, to serve non-English speakers. However, the Commission should increase its efforts to ensure that emergency alerts are transmittable to the disabled and non-English speakers. Additionally, the Commission should encourage the creation of new stations by LPFM applicants whose goal is to serve minority language communities.

**(B) Requiring a Public Information Officer to be Designated at Each Emergency Operations Center Will Ensure That LPFMs and Other Broadcasters Receive Accurate Information.**

Prometheus supports the recommendation that a public information officer be designated at each emergency operations center. Doing so will aid LPFMs and other broadcasters in effectively disseminating accurate and up-to-date disaster information to the public. The Independent Panel recommends that this individual “be accessible to the media to handle media and public inquiries, emergency public information and warnings, rumor monitoring and response, and other functions

required to coordinate, clear with appropriate authorities, and disseminate accurate and timely information related to the incident.” *Report* at 41. Designating such an individual would relieve some of the burden on LPFMs and other broadcasters of tracking down information in the midst of a disaster. Having one centralized and reliable source of information will allow broadcasters to focus their efforts on the actual broadcast of emergency information, as well as on coordinating with relief services and dealing with the technical aspects of running a station under duress.

Additionally, providing a cohesive emergency communications plan that utilizes a public information officer will ensure the dissemination of accurate information, which is of vital importance to maintaining order during and after a crisis. The Hurricane Katrina experience is illustrative of the importance of providing accurate disaster information to the citizenry. For example, Tom Hanlon, a volunteer whose organization has been waiting five years for an LPFM license, observed that “[a] lack of accurate information [about the exodus from New Orleans to Baton Rouge], coupled with the time spent tracking down false rumors, did more to delay the mobilization of Baton Rouge than any hurricane.” Prometheus Radio Project, “Astrodome Resident Families Build Emergency Radio Station,” *available at* [http://oldsite.prometheusradio.org/katrina\\_ten\\_thousand\\_radios\\_release.doc](http://oldsite.prometheusradio.org/katrina_ten_thousand_radios_release.doc) (last visited Aug. 2, 2006); *see also*, Comments of Mikkel Allen to the Hurricane Katrina Independent Panel, May 28, 2006, *available at* <http://www.fcc.gov/eb/hkip/Comments.html> (last visited July 24, 2006) (noting that local radio coverage could have dispelled “misinformation and rumors circulating after the hurricane”). By requiring EOCs to have a public information officer as part of their emergency communications plan, many of the communications problems experienced during Hurricane Katrina will be avoided, and public safety will be enhanced.

### **III. THE INDEPENDENT PANEL'S RECOMMENDATIONS ARE APPLICABLE TO ALL TYPES OF DISASTERS.**

Regarding the Commission's *Request for Comment on Applicability of Recommendations to All Types of Disasters* (released July 26, 2006), the ability of LPFMs to provide disaster relief does not vary based on the particular type of disaster at hand. Assuming the necessary infrastructure is in place, the Independent Panel's recommendations, vis-a-vis LPFMs, apply equally well to all types of disasters. In fact, the strong ties forged between LPFMs and their communities make LPFMs particularly useful in all disaster response scenarios, as the individuals responsible for operating these stations are likely to be from the affected community and to have a vested interest in providing assistance.

### **IV. RESOLVING THE LPFM RULEMAKING IN FAVOR OF A ROBUST LPFM SERVICE WILL BENEFIT DISASTER RELIEF EFFORTS.**

Expansion of the LPFM service is currently under consideration in the Commission's rulemaking regarding *Creation of a Low Power Radio Service*. 14 FCC Rcd 2471 (1999). The role LPFMs played during and after Hurricane Katrina demonstrates the immense benefits of having such stations during times of great need. The experiences of these stations should thus serve as an impetus for the Commission to resolve the LPFM rulemaking in a manner that enables the service to flourish.

There are a number of reasons for expanding the LPFM service, all of which will have a tangible effect on disaster relief. First and foremost, LPFMs have strong ties to their communities and thus a vested interest in providing emergency information to friends, neighbors, and the community as a whole. Additionally, LPFMs are likely to be attuned to the specific circumstances of their area, and thus able to provide more trustworthy and accurate information than outside broadcasters.

A more robust LPFM service will also improve redundancy by providing more pathways for

communications traffic. In addition to an increased number of outlets for dissemination of emergency information, the outlets will be of both higher quality (tailored to the circumstances of the community) and may reach niche communities, particularly non-English speaking ones. Finally, more LPFM stations will provide for better utilization of EAS, again because of their ability to provide localized emergency information.

## **CONCLUSION**

The effect of Hurricane Katrina on communications systems was devastating and demonstrated the need for a more systematized manner of preparing for and dealing with disasters. The Independent Panel's recommendations are a step in the right direction and Prometheus encourages the Commission to move forward with implementing them. An effective communications system is paramount to disaster relief efforts, and Prometheus believes that the Independent Panel's recommendations will enable LPFMs and all communications providers to better meet the needs of the public in the wake of disasters.

Additionally, in light of LPFM's successes both during and after Hurricane Katrina, Prometheus also requests that the Commission resolve the LPFM rulemaking in a manner that protects this vitally important service and allows it to flourish. In so doing, the Commission will ensure that communities across the country have access to local broadcasting that will provide the life-saving information needed by citizens in times of emergency.

Respectfully submitted,

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**APPENDIX A:**  
*The Role of LPFMs During and After Hurricane Katrina*

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**I. Introduction**

Low power FM (“LPFM”) radio is still in its infancy; however, in the six years since the Commission created the service, LPFM stations have demonstrated their ability to provide a vital community service, particularly in times of crisis. The stories of LPFMs that came to the rescue during and after Hurricane Katrina demonstrate the powerful and beneficial role such stations can play in their communities. This Appendix relays the experiences of a handful of these stations, whose vital contributions to disaster relief and recovery efforts truly made a difference.

**II. LPFMs During and After Hurricane Katrina**

(A) Brice Phillips, WQRZ (Bay St. Louis, Mississippi)

The story of Brice Phillips exemplifies the incredible resiliency of both individuals and LPFM radio during times of disaster. Phillips is a disabled broadcaster in Bay St. Louis, Mississippi, who started LPFM station WQRZ 103.5 FM with the idea of establishing a broadcast service to provide emergency information to the community in the event of a disaster. Shortly before Hurricane Katrina made landfall, Phillips and his partner, Christine Stach, packed their equipment (including a four-bay, circularly-polarized antenna, which Phillips retrieved by climbing a 130-foot tower at the station) and relocated to higher ground, where they began transmitting information to the community. Using emergency generators and car batteries to power the station, Phillips continued to broadcast survival and rescue information throughout the storm, going off the air for only a few hours while he moved batteries and other equipment to higher elevation. Of the 41 broadcast stations throughout New Orleans and the Mississippi Gulf Coast, WQRZ was one of only four that survived the storm; it was also the “only voice the Hancock County [Emergency Operations Center] could use to direct survivors to relief supplies, food, water, ice, Red Cross, medical and rescue sources.” Because WQRZ’s request for authorization to increase its power was expedited by the FCC, the station was able to transmit to a 17 mile radius, covering all of Hancock County, and thus providing maximum support and information to the community during the disaster.

With the help of volunteers, WQRZ also stayed on the air through Hurricane Rita and its aftermath. During this period, Phillips persisted in his courageous efforts to keep the station running: for example, he stayed on-air to issue a tornado warning, despite being in the tornado’s path and he also trudged through flood waters to float ten gallons of diesel fuel back to the station to keep its generator running. Since the hurricanes, Phillips has been recognized by the Small Business Administration, which bestowed on him its Phoenix Award for “courage, resourcefulness and tenacity in the aftermath of a disaster,” and by Hancock County, which named him its new Public Information Officer. According to Phillips, “[w]hen all else fails, amateur radio works until other systems get put in place

and put online.”

(B) The Houston Astrodome

When the Houston Astrodome took in some 25,000 evacuees after Hurricane Katrina, media activists saw the potential to facilitate relief efforts through the use of LPFM radio. With a temporary license for a six-watt transmitter in hand, these activists started the Katrina Aftermath Media Project (“KAMP”) 95.3 FM, Dome City Radio, to broadcast information to those housed in the Astrodome. While FEMA officials initially made it difficult for KAMP to get on the air,<sup>1</sup> once on-air, KAMP aired FEMA and Red Cross service announcements, provided contact numbers and information about free meal offers, and interviewed those who lost family members, in hopes of reuniting them. Yet without the FEMA delays, even more could have been done, such as providing information about how to apply for benefits or get ID and FEMA debit cards. As Indymedia organizer Tish Stringer said of the situation, “[t]here’s definitely a lack of information . . . and [people are] angry about it.”

(C) Sara Allen, Prometheus Radio Project Volunteer

Sara Allen, President of Ciara Enterprises, Inc., Chief Consultant for KTAO-FM in Taos, New Mexico, and a member of the Media Security and Reliability Council 2, Toolkit Workgroup Committee, testified before the FCC’s Hurricane Katrina Independent Panel about her experience as a post-hurricane Prometheus Radio Project volunteer. She highlighted the important role played by local radio—particularly LPFM—during and after emergencies, focusing specifically on the station set up outside the Houston Astrodome, and on Brice Phillips, of WQRZ in Bay City, Mississippi. Allen discussed the bureaucratic delays at the Astrodome (specifically referring to resistance from local and county officials) and notes that such delays “prevented the timely broadcast of important information to [] residents.” During the delays, information was instead broadcast over ineffective loudspeakers, which “led to the confusion and frustration of the [Astrodome] residents.” As a volunteer at WQRZ, Allen helped reconstruct the station’s surviving tower, was instrumental in getting emergency authorization from the FCC, worked on securing the necessary emergency equipment, and took over on-air broadcasting while Phillips recovered from pneumonia.<sup>2</sup>

(D) Radio HOPE and Radio Mercy

Radio HOPE was established thanks to the efforts of the Blessings for Obedience ministry after it determined that setting up an LPFM station in the disaster area would be an effective way to help

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<sup>1</sup> FEMA cited “security reasons” for denying broadcasters access to the Astrodome; the red tape resulted in a week-long delay in getting KAMP on the air.

<sup>2</sup> In addition to broadcasting news updates and emergency information, Allen also conducted a number of high-profile on-air interviews, including with Michael Chertoff (Secretary of Homeland Security), Thomas Dorr (Under Secretary for Rural Development), and Vice Admiral Thad Allen (deputy to FEMA director Michael Brown, and later director of FEMA’s relief efforts).

relief and recovery coordination efforts. The ministry was able to secure 1,000 single-frequency, solar-powered radios for distribution, and was loaned a 250-watt FM transmitter for broadcasting. After receiving Special Temporary Authority from the FCC to transmit on the 107.9 frequency,<sup>3</sup> the group set up operations on a ship that had been dispatched by Friendships Ministry to help relief efforts in New Orleans. With a broadcast radius of 15 miles, the station provided emergency information, news, messages from public officials, encouraging music, interviews with volunteers, and messages of hope. When Hurricane Rita hit a few weeks later, the ministry received another STA LPFM license to operate a second station from another ship, located in Lake Charles, Louisiana, which also provided relief information.

(E) Public Comments Submitted to the Hurricane Katrina Independent Panel

Brian Denzer, a broadcaster at WTUL in New Orleans (a “small community radio station licensed to the Tulane University Board of Administrators”) wrote of the failure of the national press to accurately report on the Hurricane Katrina tragedy, and the need for local radio to counterbalance this force. He criticized the Tulane administration for failing to make the WTUL facilities, which survived the hurricane, available to the station personnel who sought to provide emergency information to the community. Because of this, a number of WTUL staff and community members set up an ad hoc station situated in the studio of a local coffee house. The programming, called “Community Gumbo,” was intended to provide both a “forum for voices in the community being left out of the rebuilding planning process,” as well as information and announcements about the recovery process.

Mikkel Allen wrote of his experience as a Red Cross volunteer in Baton Rouge and New Orleans. He saw firsthand the power of broadcast radio to “save lives in natural or man-made disaster,” as it allows citizens to “receive and disseminate information delivering instruction, emergency preparation such as emergency medical care and first aid priorities, current weather conditions, contamination bulletins, [and] available resources and utilities.” He notes that recovery and rebuilding efforts suffered because of the lack of outlets for such information, and offers a number of proposals for how community radio, specifically LPFM, can provide solutions for recovery, relief, and rebuilding after a disaster.<sup>4</sup>

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<sup>3</sup> This STA represented the first time in FCC history that a private organization was granted an emergency license for an FM radio signal.

<sup>4</sup> Allen notes a number of services that a locally-based community station in New Orleans could have provided, including: curfew information; vital phone numbers of FEMA, the Red Cross, and the City; and information regarding grassroots organizations and services, such as soup kitchens, water drop-offs, free clinics, transportation, police activity reports, free legal services, weather and pollution bulletins, and shelter information. A community LPFM station also could have provided a forum “to address the important community issues arising after the hurricane.”

### **III . Conclusion**

While the LPFMs discussed in this Appendix reflect the incredible service that community radio can provide in times of crisis, it should be kept in mind that these stations also serve local interests on a day-to-day basis, when circumstances are not so dire. To ensure that community radio is able to reach its full potential as a provider of important, and potentially life-saving information, the Commission should strive to promulgate rules that allow the LPFM service to flourish.