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LPTV Station To Be Arbitron-Rated **Pseudo-FM eligible for PPM ratings**

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When a broadcast service looks like an FM station, talks like an FM station and walks like an FM station, it must be an FM station, right? Perhaps, but what if the station's FCC license says that it's a low power *television* station?

The frequency range for Channel 6 TV (and, of course, LPTV) stations ranges from 82-88 MHz, which is right next door, spectrum-wise, to the bottom end, or "reserved" portion, of the FM band. The vast majority of the 139 LPTV stations currently operating on Channel 6 broadcast at 82 MHz. but a few Channel 6 LPTV stations operate at 87.7 MHz – a frequency which can be picked up on the very low end of most standard FM tuners. If these stations promote themselves and operate as FM radio stations, they may become eligible to receive ratings through Arbitron's Personal People Meter (PPM) system.

The first such station to receive Arbitron ratings is WNYZ-LP (Pulse 87 New York). Beginning with the April, 2009 reporting period, Arbitron's PPM system will generate a custom report for this station, which has an estimated half million plus audience in the New York area. You heard that right: New York City – the metropolis which "tried to get people not to use the PPM" (*see* the related article in the October, 2008 *Memo to Clients*) and wound up fighting legal battles with Arbitron – will be home to the first LPTV/FM station to receive Arbitron PPM ratings.

To be eligible for PPM reporting, LPTV stations must be receivable on FM radio receivers, be lawfully transmitting under FCC authority, be marketed exclusively to radio listeners, and have audio-only programming. If these criteria are met, the station will have customized PPM report generated and the results will be reported with an "alias" call sign beginning with the letter X and ending in "-FM". Of course, TV stations are permitted to operate their visual and aural transmitters separately, with "different and unrelated" content on each, according to Section 73.653 — but the FCC still expects them to broadcast some video content, even if it's unrelated to the audio. It's not clear how that expectation can and will be met if, in order to satisfy Arbitron, the station is providing "audio-only programming", but presumably the folks involved have figured something out.