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GENERAL COUNSEL  
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Before The  
UNITED STATES COPYRIGHT OFFICE  
LIBRARY OF CONGRESS

DOCKET NO.  
RM 2002.1  
COMMENT NO. 16

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In the Matter of )  
 )  
 )  
NOTICE AND RECORDKEEPING )  
FOR USE OF SOUND RECORDINGS )  
UNDER STATUTORY LICENSE )  
\_\_\_\_\_ )

Docket No. RM 2002-1

**REPLY COMMENTS OF  
NORTHEASTERN UNIVERSITY**

Northeastern University, licensee of noncommercial FM Station WRBB, Boston, Massachusetts, hereby submits these Reply Comments in support of the "Comments of Harvard Radio Broadcasting Company," filed in this docket on April 5, 2002. Northeastern faces a very similar factual situation to that described for Station WHRB in Boston, and agrees fully with the concerns raised by the Harvard Radio Broadcasting Company. Specifically, Northeastern agrees that the guidelines proposed for "Reports of Use of Sound Recordings under Statutory License" are too stringent and would be unjustifiably and unduly burdensome for small, non-profit radio stations.

Northeastern University is the licensee of noncommercial educational FM station WRBB, Boston, Massachusetts. WRBB is a Class D FM station, and has been licensed to operate on nonreserved Channel 285 (104.9 FM) since 1984.

WRBB is a true "educational" station managed by Northeastern students in consultation with a community advisory board and the university administration. This arrangement provides an opportunity for Northeastern students and community members to learn about and participate in radio station operations. (Some students participate in the operation of the station in formal Communications Studies and Journalism courses, under faculty supervision, for which they receive academic credit.) WRBB also provides the Northeastern community with music, news and arts programming.

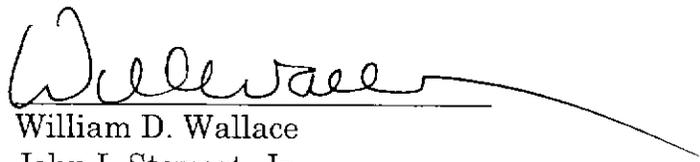
WRBB serves not only the Northeastern campus but also the Boston communities of Back Bay, Roxbury, Jamaica Plain, and Dorchester. These are areas with diverse populations, few of whom are served directly by the commercial FM stations in the market. WRBB, however, provides alternative music, news and public affairs programming directed toward these communities. In short, WRBB serves the public interest by providing a "voice" for and of Northeastern in the Boston metropolitan area and by providing service to otherwise underserved communities near its campus. However, WRBB has essentially no profits from its programming and only a very small budget, which is needed to cover current operations.

Like WHRB, WRBB generally creates its music programming in real time from a library of CDs rather than from sound recordings stored on a central harddrive. Accordingly, WRBB would incur the same types of difficulties and expenses as described by WHRB to come into compliance with the proposed rules.

Northeastern supports WHRB's proposal to exempt noncommercial  
broadcasters from the recordkeeping and report filing requirements, or to institute  
guidelines similar to ASCAP's "Experimental License Agreement for Internet Sites  
& Services."

Respectfully submitted,

NORTHEASTERN UNIVERSITY

A handwritten signature in cursive script, appearing to read "W. Wallace", with a long horizontal flourish extending to the right.

William D. Wallace

John I. Stewart, Jr.

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Date: April 26, 2002