

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of )  
 )  
Implementation of a Microstation ) RM-9208  
Radio Broadcasting Service )

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To: The Commission

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

COMMENTS  
OF  
MONSTERMEDIA, L.L.C.

**MonsterMedia, L.L.C.** ("MonsterMedia"), Licensee of Radio Stations KJOK-AM and KLJZ-FM at Yuma, Arizona, by Counsel, and in response to the Commission's *Public Notice Report No. 2254 (released February 5, 1998)*, hereby submits these Comments in the above-captioned rule making proceeding. In support hereof, MonsterMedia submits the following:

1. Although MonsterMedia believes that the availability of Microstation Radio Broadcasting Service might enhance diversity of ownership and programming in the broadcast industry, from a technical standpoint, implementation of such a service on a nationwide basis, and in many regions of the country, will create havoc.

2. According to experienced technical engineers that MonsterMedia has discussed these matters with, in order to properly protect the signals of existing broadcasters with the roll out of any microstation broadcasting service, it will be necessary to clear first, second and third adjacent channels nationwide to institute this new proposed service, thereby requiring the displacement of many existing broadcasters. The FM band in many areas of the country is so congested, that it would be virtually impossible to find even one clear channel

for this proposal.

3. AM microstation broadcasting service poses additional concerns, due to Skywave propagation. In the AM band, microstation nighttime service could cause catastrophic interference, thereby reversing all the recent improvements in AM service resulting from such proceedings as MM Docket 87-267.

4. MonsterMedia is also concerned with the proposal to permit non-type accepted equipment. If permitted, there will be destructive harmonic and spurious radiation problems, which could also result in risk to human life or public safety.

Based upon the foregoing, MonsterMedia opposes the proposal to implement Microstation Radio Broadcasting Service.

Respectfully submitted,

**MONSTERMEDIA, L.L.C.**

By: 

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March 5, 1998

CERTIFICATE OF SERVICE

I, Cary S. Tepper, Esquire, hereby certify that on this 5th day of March, 1998, I have served a copy of the foregoing "**Comments of MonsterMedia, L.L.C.**" first-class, postage-prepaid, on the following:

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