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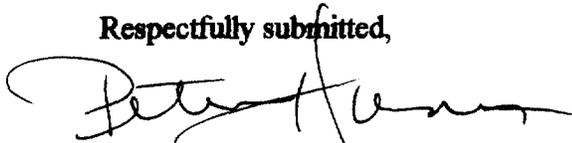
March 10, 1998

The Secretary
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

Dear Secretary:

Enclosed, please find an original signature version, and four copies of comments on "Petition for Microstation Radio Broadcast Service." [Mass Media Report number 2254; Rule Making-9208]. A copy has also been sent to the petitioners.

Respectfully submitted,



Peter Hunn
604 Meadowbrook Circle
Fulton, NY 13069
(315) 598-8952
(315) 341-3520
<hunnp@oswego.edu>

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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In the Matter of

MM [report] No. 2254

**Petition for a Microstation
Radio Broadcast Service**

RM-9208

**TO: Mass Media Bureau
[Audio Services Division]**

Comments and Adjunct Proposal

**Submitted by:
Peter E. Hunn**

**COMMENTS
{Introduction}**

Peter E. Hunn {hereafter "Commenter"} pursuant to Section 1.415 and 1.420 of the Commission's rules, hereby comments on the proposed microstation radio broadcast service petition filed by Nicklolaus E. Leggett, Judith F. Leggett, and Donald J. Schellhardt. In support thereof, Commenter respectfully states as follows:

Those who point to the best in American radio's long and useful history, typically tout its diversity and devotion to local service. Of all the electronic mediums, local radio broadcasting has traditionally provided highly responsive service to its hometown public at no actual cost to this constituency.

Due in some measure to the 1996 Telecommunication Act's relaxation of station ownership regulations, many smaller, previously served communities have essentially lost their local radio voices. New rules allow greater degrees of station consolidation. This

often plays out with smaller [erstwhile "hometown"] stations being operated from studios and offices in a larger, central-city locale.

A case in point is the Oswego, New York area. Home to five commercial broadcast outlets [including Mexico, NY, and Minetto, NY], none of these stations continued appreciable local programming [or true local studio presence] after consolidating with co-owned Syracuse-area facilities some forty miles distant. This is representative of what has occurred in former "hometown" radio markets all over the United States. Small town, or suburban stations which can afford to be truly responsive to their community of license are vanishing from the American broadcast landscape... often purchased by large broadcast firms, and reconstituted into a "full power translator" for a metropolitan station.

The proposed Rule Making [RM-9208] affords great promise to those hoping that a piece of the aural spectrum might be returned to people who exhibit the spirit of local service broadcasting. Since the 1920s, this type of individual has labored to dot America's airwaves with diverse and responsive hometown radio voices. Should the Commission see fit to allocate space for microbroadcasting, there will, no doubt, be an amply supply of those willing to continue in the aforementioned legacy of service.

{Challenge for Microbroadcasting: Spectrum Scarcity}

While Commenter concurs with Petitioners that practical and timely Commission implementation of the desired low-power service calls for a single AM, as well as a single FM frequency allocation, technological history demonstrates that two such frequencies will not satisfy expected microbroadcast station license demand.

Also logical is the assumption that the proposed service's "average licensee" will not desire to make a commitment to full-time station operation. This is especially true when "live - local" programming is expected as a microbroadcaster's principal product. It is the Commenter's belief that the proposed service will largely be attractive to radio "hobbyists"

who simply want a slice of recreational air-time to call their own. Few low-power station owners are likely to "quit their day job" in order to be full-time management, talent, and sales personnel with a live - local, 24-hour per day microstation offering \$5 commercials [or sponsorships messages].

During the early 1980s, nearly single-handedly, the Commenter operated a Class "A" FM station in Port Henry, New York. It was rewarding, but... trying to come up with innovative live - local programming seven days per week, for modest commercial support, can be an overwhelming challenge. That is why **TIMESHARE LICENSING** is suggested, by the Commenter, for the FM frequency in the proposed microbroadcast radio service.

{Up To 168 Low Power Broadcast Licenses On One FM Channel Per Community}

Through timeshare licensing, an authorization procedure used successfully by the present Commission and its predecessor, The Federal Radio Commission, a single, nationwide, microbroadcast FM frequency may be multiplied dramatically by licensing stations to operate one hour per week. This affords ample room for hundreds of thousands of such American radio stations [168 in each small community... Greater quantities in geographically larger cities], and provides time enough for the licensees to concentrate on delivering 52 well developed programs each year.

License terms would run for five years. The hour of operation would be on a "first-come-first-served" application basis. Consequently, the initial successful applicant might request and be granted 7:00 to 8:00 a.m. Tuesday. Then again, some may desire 1:00-2:00 a.m. Saturday. It is the Commenter's belief that using timesharing to sharply reduce frequency scarcity will ensure an equitably, and ultimately, success to the proposed microbroadcast radio service not otherwise possible. Additionally, the limited on-air time for which a microbroadcaster would be responsible [one hour per week], should ensure

that this service remain highly local ... and not the province of ubiquitous satellite-delivered, or regionally consolidated programming.

{Transmitter Power / FM Antenna Height}

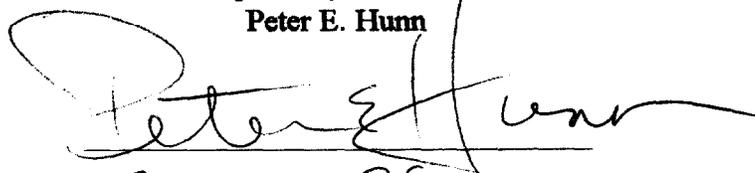
With regard to Petitioners' proposal, it would seem that 20 watts of power for AM [with some form of long-wire antenna to make the post-sunset authorized hours attractive to "skip/DX" enthusiasts]; and 5, watts with antenna height not greater than 15 meters above average terrain for FM installations, would be ample for the type of hyper-local community service proposed. FM's "capture-effect" would allow a single FM channel to sustain a number of cities-of-license [each with up to 168, one-hour per week microstation authorizations] in the average-size county.

{Conclusion}

The Commenter concurs with Petitioners in suggesting that the Commission establish "an affordable microstation radio broadcast service that will provide additional outlets of information, service, and entertainment." Through the use of timesharing, such a service is technically achievable, today, without interfering with established broadcasters.

WHEREFORE, Commenter urges the Commission to modify its rules to allow for microstation radio broadcast service on a "timeshare" basis.

Respectfully submitted,
Peter E. Hunn

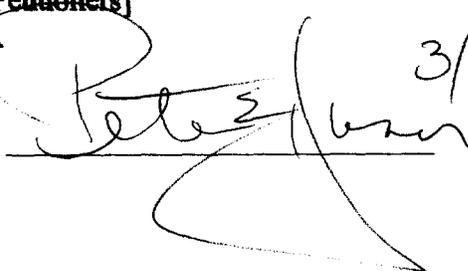
A handwritten signature in black ink, appearing to read "Peter E. Hunn", written over a horizontal line.

604 Meadowbrook Circle
Fulton, NY 13069
(315) 598-8952
(315) 341-3520
<hunn@oswego.edu>

Certificate of Service

I, Peter E. Hunn, do hereby certify that a true copies of the foregoing "COMMENTS" were sent March 10, 1998, by first-class United States mail, postage prepaid, to the Secretary of the Federal Communications Commission, and to:

Nickolaus E. Leggett [for Petitioners]
1432 Northgate Square #2A
Reston, VA 20190-3748

 3/10/98