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Enclosed.....Original and nine copies of

comments with respect to RM 9208, 9242 AND 9246

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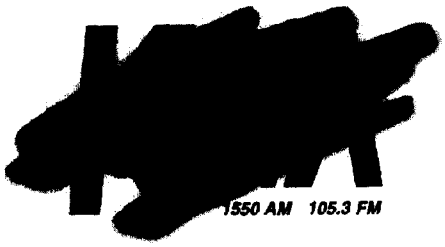

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April 20, 1998

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Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Please accept these comments with reference to RM numbers 9208, 9242, and 9246, all concerning proposals to create low power broadcasting services.

I am General Manager of KIWA, KIWA-FM, Sheldon, Iowa, population 5,000. Our stations are family owned and not associated with any large ownership group. Here in Northwest Iowa we have many smaller communities which are served by one or more AM and FM Radio Station. All have excellent records of Public Service. We are responsive to the needs of our listeners and communities. I have found that this attitude is common in communities throughout the United States.

There are several serious concerns about the Low Power Proposals which I wish to address-

1- Concerns about the availability of Frequencies.
Both the AM and FM Dial are already crowded to the maximum. When additional stations are put on the air, they immediately diminish the effectiveness of other stations who are near them either geographically or

in the radio spectrum. Even low power stations could add to the problem. As an example, KIWA-AM is licensed for nighttime power of only 11 watts in order to protect a station in Canada nearly 1,000 miles distant. Imagine the havoc that would be created by thousands of new stations with only one or even fifty watts of power.

2- Inefficient use of the spectrum. The value of the radio spectrum has become very apparent. It would appear that thousands of very low power stations with little committment to their communities, and probably with limited oversight and regulation would be very inefficient use of this valuable spectrum.

3- Control of quality of signal. Currently radio stations in the AM and FM services use high quality equipment which is closely monitored to assure quality transmission and limited interference. If a low power service were created, many of the transmitters could be home made, or very low priced models which may or may not be able to keep their signals within the parameters now followed by existing AM and FM stations.

4- Logistic and Financial Concerns about regulation of the new Low Power services. With a restricted budget and 12,000 radio stations, the FCC has not been able to inspect stations as thoroughly as they have had in the past. In many states, including Iowa, our State

Broadcasters Associations have implemented a self-inspection program. We pay qualfied engineers to inspect our stations for us, and they report to the FCC Field Office. Our stations do this because we know the importance of all stations keeping their operation within the technical standards that have been imposed on us.

If the new low services were established, there is no indication that either the new licensees or the Federal Communications Commission would have the means to assure conformity to technical standards. The result would be chaos.

With little or no oversight, individuals with only one watt or even 50 watts would soon be tempted to boost power or shift frequencies. In so doing, they would create another new wave of 'Pirate Stations', except that these would have a license to operate.

5- The application process could become a nightmare for the FCC. The FCC has now reached a point where most broadcast applications are handled in a timely manner. Since the cost of equipment and other facilities for a new low power station would be minimal, the FCC could be overloaded with hundreds of thousands of of applications from people who want to 'own their own radio station'.

This would present an impossible dilemna for an agency which already has a heavy burden of regulating the existing services within the allowed budget.

6- Existing AM and FM stations have proven their committment to serving their communities and the public. I have been involved in local radio for over forty years, and quite frankly, I believe that committment is more solid now than ever. It is important that this is recognized when Low Power Proposals are considered.

For these and many reasons, I respectfully suggest that no Low Power service should be created.

Sincerely,

Frank Luepke, Mgr.
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