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OREGON ASSOCIATION OF BROADCASTERS

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23 April 1998

Reference: RM-9208
RM-9242

Secretary of the FCC
Federal Communications Commission
Washington DC 20554

Dear Secretary:

The Oregon Association of Broadcasters (the OAB), representing the commercial radio and television stations in Oregon, is opposed to the establishment of new low power AM and FM services. The OAB would strongly urge you to not proceed with a formal rulemaking proposal looking toward adopting the proposals.

The OAB believes that if these proposals are adopted, the resulting negative impact on the integrity of broadcasting in America will include:

(1) A substantial increase in the interference levels already existing in a congested spectrum, particularly in medium and larger markets.

(2) Permanent amnesty to hundreds of illegal "pirate operators" who have a proven record of an arrogant disregard for technical compliance with FCC rules and operating requirements.

(3) Creation of a service which will create thousands of new stations without any realistic ability of the FCC to police or regulate these operations.

(4) Creation of a category of stations, fully capable of competing with local broadcasters, but with little or no "public interest" obligations otherwise required of conventional broadcast stations.

(5) A return to the chaos and financial calamity imposed on the broadcast industry in the 1980s with the adoption of Docket 80-90 and the thousands of new signals which flooded the spectrum, the results of which led to the massive consolidation of the industry in the 1990s.

(6) A general erosion of the broadcasters' ability to survive financially, particularly in smaller markets, where low power stations could operate with similar facilities but without similar public interest obligations.

The OAB urges you to not support the establishment of low power AM and FM radio stations.

Sincerely,

Bill Johnstone, Executive Director
Oregon Association of Broadcasters