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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY
**Bayview Communications
Inc.**

P.O. Box 60
Cordova, Alaska, 99574
Ph: (907) 424-3796
Fx: (907) 424-3737
email: bayview@cordovanet.com



To: Whom It May Concern
Fm: J.R. Lewis
Re: "Pirate" Radio Stations

April 23, 1998
Re: RM-9242 and 9208

I have had the pleasure of owning and operating Cordova Alaska's two local radio stations for the last six years. I am 29 years old, have a wife and infant son, and consider myself to be a family man committed to the needs of my community.

The suggestion that new, little stations might be able to just pop up randomly is very frightening to me. The market for radio advertising dollars in a town this size (a fishing village with about 2500 residents) is extremely limited, as is the listener base. It's very difficult to reach everyone with critical information with just the two stations as it is. To further divide the market, particularly if the new stations will not be subject to the same standards of community service and FCC scrutiny, will only hurt the flow of information. Tiny operations will not have the access to information that we have (in the form of national, state, and local news) -- thus, their listeners will be missing out on that information. Sure, such programming may be fun -- but at what cost? Uninformed listeners who are unaware of important public meetings, issues, and information? I know from personal experience how hard it can be to reach listeners with the information they need -- and I truly believe that these proposed measures will make things worse. And what of EAS? Will all of these stations be required to participate? What if there's an emergency and their listeners are unaware of it? How is the public better served in that regard?

In addition, will these broadcasters be accountable to the public in the same way that we are. Who will monitor their standards of decency? Will they be required to maintain public files as we are? Will they be required to make certain that their transmitters are not interfering with existing signals? Will they pay FCC regulatory fees as we do (fees which are extremely hard on our budgets in small towns where a station is very lucky to gross \$100,000 annually)? Will there be a fair and level playing field? Low power may mean low range -- but in a town our size, 5-10 watts can cover the whole town. Is it appropriate for a tiny station to benefit from the same coverage as us, without having to pay the costs that we do?

Further, as I mentioned, the budget for radio advertising is minuscule at best with most local businesses. For these tiny stations to have an opportunity to take away

our advertising dollars without being obligated to the same operation and regulatory costs puts us at an extreme disadvantage. It would force us out of business -- bottom line. We already charge virtually nothing for our advertising in order to make it as affordable as possible for our local merchants. If that market is split any further, we will be forced to either raise rates substantially, or shut down -- and then where does that leave the town? KLAM has been here since 1954 -- how would people feel if that station went dark because these little operations divided up an already undersized pie? How does that help the town?

We're not in this to make money -- our bottom line and reputation prove that. We are totally devoted to public service on both stations. We have a daily talk show, a live morning show, a community calendar, a classified ad program, Christian programming; national, state, and local news, local and marine weather forecasts, and the list goes on. We have proven that we can serve this community in a professional manner that upholds community standards. And furthermore, ANYONE who wants access to our airwaves for ANY reason has two opportunities to do so EVERY WEEKDAY (and we can make time available on weekends too if a serious need arises). We maintain a top notch public file, are constantly aware of and responding to community concerns, and pay all our FCC fees without complaint -- and all of this is accomplished in a small, American, family business.

Local radio does its job, and does it well, in this part of the world; and I'm sure the story is the same in most rural markets. I can't speak for Urban areas; but I know that if pirate radio stations are legitimized in this area, or similar rural areas, it will do far more harm than good.

Please do not allow actions to be taken which will destroy what local broadcasters have worked so hard to build. I know there may very well be stations out there that don't do what they should to serve their community's best interest -- but please don't judge all of us by that standard. It does no good to punish everyone and put all of us at risk because there are some stations not doing their job. Most of us are trying really hard, with limited resources, to make a difference in our communities. Taking that ability away, or even undermining it, will NOT help this town.

Please consider these issues carefully before making this decision. I am happy to discuss these comments further if need be. You may contact me by using any of the methods in the letterhead.

With all sincerity,



J.R. Lewis
Pres/GM
KLAM-AM/KCDV-FM