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APR 28 1998

FCC

April 25, 1998

Magalie Roman Salas
Secretary
FCC
1919 M Street, NW
Room 222
Washington, D.C. 20554

Re: FCC File Nos. RM -9208 & RM-9242

Dear Ms. Sala & Commissioners:

I am writing with strong objection to plans which would allow low power FM stations to operate virtually unrestricted. I believe this has the potential of causing an unprecedented amount of interference with licensed full-time broadcasters who presently serve their communities in exceptional manner.

KGRR broadcasts editorial opinions, takes stands on local, national & state issues, donates over 12,000 minutes of free airtime to public service groups each year and has actively involved itself in the sponsorship and presentation of dozens of community events, including school concerts with famous name guest clinicians, original musical comedies, jazz & blues festivals, scholastic achievement awards, etc. KGRR and all Dubuque market stations have traditionally worked with civic, governmental and cultural groups for the better of our community.

The last thing this, or any other market, needs is a group of low power radio stations run by amateurs who have no technical understanding of the industry, or dedication to their community. The age of "amateur and experimental radio stations" belongs to the earliest days of this century. For the government to begin licensing such stations will be the beginning of the end of responsible broadcasting and create technical interference beyond anyone's imagination.

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List ABCDE

Hemmer Broadcasting Co.
2115 John F. Kennedy Road • Dubuque, IA 52002
Phone: 319-556-7625 • FAX: 319-556-3994 • http://www.kgrr.com • Email - kgrr973@mwci.net

It is obvious that the FCC hasn't the time or staff to adequately inspect or supervise the 12,000+ legitimately licensed stations now on the air. There is little hope that any form of responsible regulation is possible if hundreds, or thousands of low power FM stations are suddenly allowed to pollute the airwaves.

Sincerely,

Paul Hemmer
President/General Manager
KGB.

WLKI FM 100

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FCC MAIL ROOM

April 24, 1998

Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20554

With Reference:
File # RM 9208
File # RM 9242

Good Morning!

With respect to proposals before the Commission to allow so-called Micro Stations to use the airways:. Please observe that aside from the new "expanded band", AM radio is already a chaos of interference. In many areas, the FM dial is similarly congested. Note, however, that under the present system, the Commission at least has the means to police the respective bands to keep unlicensed stations, regardless of power, off the air.

This policy should be continued. If these pirate stations are allowed to proliferate, both the AM and FM bands will soon come to resemble Citizens Band Radio. What standards would be required of such stations? Will they provide greater diversity of ideas, or merely become "electronic soapboxes" for a limited number of people to preach only a <u>single</u> religion, philosophy or political point of view?

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ST. ROAD 127N • P.O. BOX 999
ANGOLA, INDIANA 46703 • (219) 665-9554 • FAX (219) 665-9064

Our station has always made certain that many points of view are presented on our air. Of course we run the usual Public Service Announcements for scores of worthy activities in our small (pop. 6000) community, which is also served by a non-commercial college FM. But we go much further than PSA's. For example, this week we are spearheading the local March of Dimes Walkathon. Our air-personalities will be walking with the participants, and broadcasting on-location throughout the afternoon. We have conducted Bowlathons for Big Brothers/Big Sisters. Our Christmas food drive brought in three tons(!) of food for the needy this past season. Imagine the damage that a co-channel or adjacent channel pirate would do to our little 4,000 watt FM station. We will no longer be able to provide our community service efforts, our news reporting, our sports play-by-play, etc. In times of emergencies will these pirates (Licensed or Unlicensed) be required to provide EAS services?.

Please don't open this Pandora's Box. It is true that Commercial stations are run for profit, but that is the very reason they are in a position to offer the kinds of activities mentioned above.

Sincerely,

Thomas R. Andrews

Thomas R. Andrews
Lake Cities Broadcsting Corporation

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FROM: SOUTH GEORGIA BROADCASTERS
WUFE/ WBYZ RADIO
P.O. BOX 390
BAXLEY, GA. 31515

APR 28 1998
FCC

TO: FEDERAL COMMUNICATIONS COMMISSION
ROOM 222
1919-M STREET N.W.
WASHINGTON, D.C. 20554

(REPLY COMMENTS--FILE NO'S RM-9208 AND RM-9242)

THANK YOU FOR THE OPPORTUNITY TO ENCOURAGE YOU NOT TO GET US INTO ANOTHER 80/90 SITUATION WHERE WE SAW APPLICATIONS FOR STATIONS THAT NEVER WENT THE AIR OR SOME MONTHS LATER CLOSED THEIR DOORS. IN OUR PART OF SOUTHEAST GEORGIA THERE ARE DOZENS OF STATIONS ALREADY SERVING THEIR RESPECTIVE COMMUNITIES WITH ENTERTAINMENT AND LOCALLY ORIENTED PROGRAM GEARED TO EACH COMMUNITIES NEEDS.

SIGNALS ARE ALREADY BEING KNOCKED BACK BECAUSE OF 80/90 LOW POWER STATIONS THAT WE APPROVED. OUR LOCAL PROGRAMMING INCLUDES BLOODMOBILE BROADCAST, GOAL STUDENTS BROADCAST, FUND RAISERS FOR COMMUNITY PROJECTS, VARIOUS SOUTH GA. CITIES FESTIVALS BROADCAST, ETC.

THANK YOU FOR A NO VOTE ON ADDITIONAL LOW POWER STATIONS.

SINCERELY,

AL GRAHAM, PRESIDENT
SOUTH GEORGIA BROADCASTERS
BAXLEY, GEORGIA 31515

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THE FLATHEAD B98 ROCKS
NEWS•TALK RADIO KJJR 880 AM
THE BEAR 106.3
The Mountain KKMT 95.9

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FCC
Room 222
1919M Street, N.W.
Washington, DC 20554

Reference: FCC File nos. RM-9208 and RM-9242

We strongly oppose the idea of allowing low-power stations in every market. This is another way for the FCC to water down the radio industry by bloating it with frequencies in the market.

We support St. Jude's by hosting a radiothon each year. We have also supported our local Wings program that helps families with expense associated with cancer treatments. We have hosted a 24-hr radiothon for them.

Please feel free to contact me on this issue.

Sincerely,

Benny Bee, SR
President, CEO
Bee Broadcasting, Inc.

CC:
Senator Conrad Burns
Senator Max Baucus
Representative Rick Hill

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Bee Broadcasting Network, Inc.
P.O. Box 5409 • Kalispell, MT 59903 • (406) 755-8700
(406) 756-5557 (KJJR) • (406) 257-5327 (KDBR) • (406) 755-7625 (KBBZ) • (406) 257-6686 (KKMT)
Fax (406) 755-8770 • Cellular (toll-free) *BEE

Flathead Valley's Best Radio Combination

4/28

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[redacted]

RM 9242
9208

BCI

Brooke Communications, Inc.

KRSB-FM KKMX-FM

KQEN-AM

April 23, 1998

F.C.C. Room 222,
1919 M Street, N.W.
Washington D.C. 20554

Subject: the Skinner petition

To whom it may concern,

The purpose of this letter is to express my opposition toward two petitions before the F.C.C. regarding microstations, primary service stations, and the request for rule making submitted by Roger Skinner. I think the entire notion would mean certain doom for broadcasters who already abide by the rules established by the F.C.C. I believe that we will face the same fate that occurred in the `80's from Docked 80-90. Those of us who are broadcasting legally are doing so through no small amount of hard work and we definitely don't take our commitment to our communities lightly. We are now preparing to sponsor a 10 kilometer run. This run will include a large number of handicapped. Our station also sponsors Camp Ukandu which is a camp for children with cancer. We also advertise for every festival in our contour. We run advertising for the Red Cross and numerous other non-profit community oriented organizations. This station is heavily involved in the community. We even provide entertainment for Shobu, Japan ambassadors during their foreign exchange program.

Our community involvement is not an easy task. However, it is difficult to accomplish with ongoing interference from pirate radio. Recently, I've encountered illegal two-way communications that have mixed with us and caused color bursts on the neighboring site cable provider. I could go on for days about interference problems from non-licensed transmitters. In short I think the whole idea will cause many more headaches for the F.C.C. and broadcasters alike.

Sincerely,

Thomas A. Woods Jr.
(chief engineer)

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Post Office Box 5180 • Roseburg, Oregon 97470 • Phone: 541-672-6641 • Fax: 541-673-7598

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AM 920 WPTL

Skycountry Broadcasting INC. • P.O. Box 909 • Canton NC, 28716 • (704) 648-3576 • Fax (704) 648-3577

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FCC MAIL ROOM

April 24, 1998

FCC, Room 222
1919 M Street NW
Washington, DC 20554

RE: FCC File nos RM-9208 and RM=9242

Forty years of my personal dedication to the Radio Industy and 20 years this year in individual community station ownership and operation will be placed is serious jeapordy by creation of numerous low-power local access radio stations.

First, this will further congest an already congested service. Next, it will dilute the media pool and audience will fragmentize to the extent that no voice will be sufficiently viable to be a serious community service.

My personal experience with the vast majority of those espousing this new service are individual "pied pipers" interested in their own personal and narrow causes and program streams. They complain of being unable to afford a station? It took me from 1958 to 1978 to acquire mine. The answer is work, patience and credibility, not lowering the access threshold to valuable community resources.

Our community is served by local cable access channels, two public radio stations with widely diverse programming, four local stations, numerous wide-area signals, plus the Internet which could prove ideal for the type of access most low power advocates seem to feel deprived of.

The pressures of media explosion audio and otherwise makes my licensed property less valuable today than when I purchased it in 1978. Remaining in business is more difficult every year. And I am a "smaller" community station. I shudder to think what these idealistic want-to-be operators will face in trying to function as a broadcast service, and, what they will do to my ability to continue a level of involvement the FCC and our audience should expect from my frequency.

Don't destroy the most diverse and successful broadcast system in the world.

Sincerely

Wm. Reck, Pres.
Skycountry Broadcasting Inc.

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APR 28 1998

FCC MAIL ROOM

Keith Bouldin
POB 277
Rio Nido, Ca. 95471

COMMENTS ON: RM 9208

Dear FCC Members,

I urge you to support allocating frequencies for low power radio stations. The recent consolidation of high power commercial radio stations leaves many of us without stations that give us local news, PSAs and programming.
Low power local radio stations can serve the public interest if the FCC sets it up to do so. Considering the garbage on the 'hot talk' format, with good oversight, these low power stations pose no risk of violating current FCC decency guidelines. These stations will also give us much more listening options on our radio dial. Commercial radio has become boring with many of the stations playing the same, format and/or the same satellite programs. I don't want to listen to music shows based in some far away city.

Thank You
Keith Bouldin

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ALL HITS K101 TOGETHER

KWCD 92.3 FM

ALL AMERICAN COUNTRY

April 24, 1998

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FCC MAIL ROOM

FCC
Room 222
1919 "M" Street, NW
Washington DC 20554

Dear FCC:

I am writing to voice my concern about "RM-9208" and "RM-9242". Allowing numerous low-power stations to flood a market could cripple the ability of stations like ours to serve our already limited coverage area. We are already limited to a fraction of our vast "trade area" do to concerns about signal overlap. Many of our listeners live outside our city grade coverage, but still pick us up well. The advent of new, "low-power", amateur broadcasters in this market would be very detrimental, especially if we were not allowed to increase our own power.

Sincerely,

Paul Orlando
General Manager, KZMK/KWCD

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C:\WORK\Administration\Correspondence\FCC RM-9208 RM-9242.doc

P.O. BOX 2770 • 2300 BUSBY DRIVE • SIERRA VISTA, ARIZONA 85636

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100,000 WATTS STEREO 101.5

P. O. Box 280, Brownwood, Texas 76804
(915)646-1015 FAX: (915)646-2220

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April 24, 1998

Federal Communications Commission
Room 222
1919 M Street, N. W.
Washington, D.C. 20554

"Reply Comments" FCC File # RM 9208 & RM 9242:

There are still plenty of locally oriented stations in Texas and here in Brownwood. Being a long-time broadcaster and station owner in some twenty Texas markets, I know what the situation is. There is a station in Brownwood broadcasting Spanish language programing; there is a full time religious station here and we are a small market. There are stations in Abilene, Fort Worth, Dallas, Houston, Austin, San Antonio and most markets all over Texas broadcasting strong local programing.

I can't believe the Commission is seriously considering allowing thousands of new low power stations in our markets that are already crowded with signals, thanks to Docket 80-90 which was devastating in its effect on broadcasters. There are plenty of stations available in each market which can be purchased by these groups that want to further their agendas.

I don't think it is the right of the tax payers to provide these extremist groups with pirate radio stations to clutter up the airways when their views are already being heard.

Thank you for your consideration.

William W. Jamar

William W. Jamar
President
Brown County Broadcasting Co.

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WWJ/bjd

WLMI
COUNTRY 103.9 FM

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BEECH TREE BROADCASTING CO.
SERVING McKEAN, ELK, FOREST & WARREN COUNTIES

April 24, 1998

Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20554

Reference: File Nos. RM-9208 and RM-9242

To the Honorable Commission:

Beech Tree Broadcasting Co., licensee of WLMI (FM), Kane, PA, submits this comment, and wishes to be put on record as opposing proposals to create a class of low-powered "community" radio stations.

WLMI (FM) is licensed to a community of 4600 people. This station is free-standing, and not part of any media consolidation. We take very seriously our committment to serve the community in a wide variety of ways. These range from the reading of school lunch menus, community events and lost pet announcements, all during morning drive time, to regularly scheduled, locally produced public affairs broadcasts, which are aired during weekday morning/midday/early evening dayparts. We work hard each year on community fund-raising activities, which include buying a new fire truck, installing lights at the high school athletic field, and sending a local family to the Atlanta Olympics to see their daughter run in one of the events. This May, we will broadcast a radiothon to help the Kane Family Center raise operating funds following the expiration of a grant.

Kane does not need a low-powered "community" station operating out of someone's basement; it has a 24-hour professional station, that provides jobs for four full-time and four part-time employees.

We have no objection to low-powered stations operated on a limited number of specified dates in conjunction with special events, but feel that one license per owner would be sufficient.

Very truly yours,

Charles W. Crouse
President/General Manager/News Director

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27 FRALEY ST., P.O. BOX 868 KANE, PA 16735-0868 TEL: (814) 837-9711 FAX: (814) 837-6154

KSNM • FM GREAT SONGS GREAT MEMORIES 98.7
KXDA • FM THE ROCK OF LAS CRUCES 103.1

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P.O. Box 880
1355 E. California St
Las Cruces, NM 88004

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FCC MAIL ROOM

FCC
Room 222
1919 M Street, N.W.
Washington, DC 20554

Reference: FCC File No.s RM-9208 and RM-9242

I am writing to voice my concerns over the possible acceptance of Low-Power FM channels. We have experienced interverence from two pirates. One of those was in Silver City, NM and the other was in Cloud Croft, NM. The Silver City pirate station had our listeners in that market really mad. The Denver office of the FCC looked into that situation. They are now gone from our area. The Cloud Croft situation has not been resolved, to the best of my knowledge. On another matter, one of our stations has been short-spaced to a station in neigboring Texas and we are in the process of moving our station farther away from them in hopes of being able to supply better coverage to our home county.

In regards to Public Service. Our stations have provided local organizations with the following: Children's Miracle Network $14,000+ in on-air announcements in 1997. They raised over $134,000 for the local hospital. And we are going to be providing over $20,000 this year for the same campaign with a goal over over $150,000. We also donated over $7,500 for the Walk America for March of Dimes this year and they raised around $50,000 for research. We also donate around 10-15 other Local Public Service announcements per day for local organizations to help them raise money for projects at schools, churches, etc.

From a revenues standpoint, there are already too many stations in many markets for all of use to make a profit. Now I realize that the issue here is not about making money, but if additional FM's are licensed to broadcast, they will have to sell advertising as a means of support, and the pie is only so big. Additional stations added to the market consisting of now over ten local stations and another dozen radio stations that penetrate our market from El Paso and a few more from Mexico would really make it more difficult for many of us to survive.

The other local stations are involved in similar Public Service work...serving our communities very well. More stations is not the answer...especially stations that will not have much power to cover large areas. In our state, the population is spread out. In fact, it is very difficult for many of our local stations to cover our local county with the signals we have.

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I hope you will close this window and not allow additional stations to come on in our market. The 80-90 dockets of a few years ago opened the markets up significantly enough to provide more than enough service for local communities.

Thanks for taking time to read my comments.

Bob May
GM
KSNM/KXDA
Sierra Industries, Inc.
Las Cruces, NM 88001

cc file

KCGU EMOR
Gowdy FM 95

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Kowb!
SPORTS RADIO 1290 AM
Curt Gowdy Broadcasting

April 24, 1998

RM-9208

Federal Communications Commission
Room 222
1919 M Street, N.W.,
Washington DC 20554

Dear Sir or Madam,

I'm writing to express my strongest concern regarding FCC Files RM-9208 and RM 9242. As you are aware, these proposals are intended to address the "problem" of under-represented minority viewpoints in any given community.

I know I speak for many, many broadcasters in my state when I contend that this is a solution in search of a problem. In our operations in Wyoming, we offer numerous community oriented programs to address these views. Just two of which are our OPEN MIKE program (hosted and edited by our award-winning news director) and GEM CITY GALLERY (a strongly feminist flavored program hosted by our Morning Personality, Janine Jordan).

We are also fortunate in Wyoming to be served virtually state-wide by the National Public Radio network through the satellite operations of the student station at The University of Wyoming.

The advisability of allowing dozens (perhaps hundreds) of "pirate" station operations in this community and state would be total chaos.

I respectfully suggest that the Commission will be abandoning the workable, controlled environment we now enjoy in radio...and adopting a policy that will only bring confusion and anarchy to this business.

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Andrew W. Hoefer — General Manager P.O. Box 1290, Laramie, Wyoming 307-745-4888

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FCC MAIL ROOM

I and my colleagues here at KOWB and KCGY urge the complete and rapid defeat of these proposals. I will be writing a similar letter of concern to our congressional representative, Mrs. Barbara Cubin.

Let common sense guide us in this matter.

Sincerely,

Andrew W. Hoefer
General Manager and Vice President