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April 22, 1998

Secretary of the FCC  
FCC  
Washington, D. C. 20554  
Reference: RM-9208 & RM-9242

The members of the Portland Area Radio Council, (PARC), a trade association of 22 local radio broadcasters in Portland, Oregon, strongly oppose proposals under consideration by the FCC that would allow low power FM frequencies.

Conceived as a way to provide micro-niche programming for minorities, churches, neighborhoods and community groups, in fact, this well-intentioned small step would open to the door to more problems than it would solve. Allow us to outline briefly our concerns.

**Interference with existing broadcasts could hinder the public safety**

Low-powered, not fully- regulated, broadcasters will hinder the public safety due to potential interference with aviation, cellular phones and emergency service providers who rely on the radio airwaves. They can also interfere with existing broadcasters. "Legalized pirate" radio will not serve a broader community, but hinder the community already being served.

**Local Radio Serves the Community Now**

The greater public is already tremendously served by existing broadcasters. Radio's strength comes from being a mirror of the community. Conservatively, Portland broadcasters alone contribute more than \$10 million each year to local causes that match their formats and the needs of their listeners--from programming, on-air time, promotions, cash contributions, and coordination of major community events to special activities, both large and small. Through all of these efforts, the local community is well served.

Furthermore, if these proposals are adopted, the resulting impact on broadcasters will include:

- Permanent amnesty to hundreds of "pirate operators" who have a proven record of arrogant disregard for technical compliance with FCC rules and operating regulations
- Creation of a service which will create thousands of new stations without any realistic ability for the FCC to police or regulate these operations.
- 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.
- A return to the chaos and calamity imposed on the broadcast industry in the 1980's with the adoption of Docket 80-90 when thousands of new signals which flooded the spectrum.

We appreciate this opportunity to express our deep concern about the potential danger of this regulation to our community and our members, whom combined, employ hundreds of people in this market.

Sincerely,

Monica Cory  
Executive Director

cc: Sen. Ron Wyden  
Sen. Gordon Smith

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