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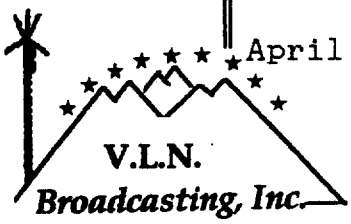

April 30, 1998

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

RE: Reply Comments
FCC File Nos. RM-9208 and RM-9242

Dear Commissioners,

I am writing to you as an Operations Manager of an AM and FM station in Southeastern Illinois. My thoughts are in reference to the commissions consideration of the licensing of new low power radio stations.

I feel very concerned about the possibility of new, low power stations being added to an already overcrowded field of community radio stations. We, as small market radio professionals, serve our communities best interest by providing vital daily information, and life saving information during inclement weather. It is no secret that operating a commercial radio station takes a large amount of capitol and revenue. Please remember that profits are not simply applied to the owners pocketbook. We need more and better equipment to serve the public's best interest. If low power stations begin edging into our "profit" margin, our services will decrease significantly, possibly to the point of shutting the station down. Why should we force the public to look elsewhere for the information that we have been giving them for over 50 years?

Please keep in mind that the majority of broadcasters are in much of the same position as I. We have adopted small market radio as an integral part of our life, and we take the job very seriously, and do it professionally. Please keep that in mind, and do not allow low power radio stations to become a reality.

Respectfully,

Eric Pitts
Operations Manager
WVLN-AM
WSEI-FM

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In the matter before the

FEDERAL COMMUNICATION COMMISSION

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RESPONSE TO REQUEST FOR COMMENT, "MICROPOWER BROADCASTING"	RFC No.: RM-9208, RM-9242 REPLY COMMENTS

COMES NOW Gary A. Barrett, radio broadcaster, to plead with the Commission not to adopt the proposal for "micropower broadcasting" as part of its rules.

This proposal, while a valiant attempt to provide more access to the airwaves, is frought with problems which the Commission may not have the resources to overcome.

First, the proposal is predicated upon First Amendment considerations. The First Amendment entitles each INDIVIDUAL to freedom of speech and expression. A review of the programming of the current (illegal) broadcasters who claim to be "microbroadcasters" finds little speech or expression. Locally, a station called "Iowa City Free Radio" broadcast primarily rock and alternative music with no intended message or expression. Further, a review of communications on the Internet's message system "Usenet" under the category of alt.radio.pirate finds discussion not of political broadcasts, but of the kinds of music that are played on-the-air. Freedom of Speech is

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NOT "freedom to play my kind of music on the air" and arguments to this end should be rejected.

Second, the proposal is simply unworkable. It asks the Commission to impose upon its already overwhelmed staff (which is not able to adequately enforce existing rules) to implement a "cellular" scheme for each community in the United States, to oversee the operation of these stations and ensure that both existing broadcasters and new micropower licensees do not violate interference and other broadcast rules of this Commission. Further, the Commission staff must ensure there is only one licensee to each site and must mediate all license challenges are likely to ensue.

I would remind the Commission that it has already dedicated radio spectrum for virtually unregulated free expression. The Citizens Radio Service remains available for two-way communications between individuals. However, should the Commission seek to implement these rulemaking requests to allow "broadcasting", it should be reminded of what occurred when restrictions on Citizens Radio Service operation were lifted: Channels became crowded, interference due to over-use and abuse made transmission impossible. This should not be permitted to happen to the broadcast airwaves and unless the Commission is prepared to dedicate the resources necessary to police the broadcast spectrum to ensure the public is not subject to interference, the rulemaking request should be denied.

Existing local AM and FM broadcasters are doing a much better job of providing minority, community and foreign groups access to the airwaves than

are those who call themselves "microbroadcasters" today. On our station, KCRG-AM, our daily talk show has hosted countless forums for community discussion of the issues in OUR community. The argument that the airwaves are controlled by "large corporations" is unfair and untrue. Local radio stations succeed when they meet the needs and demands of the local population. That includes news, public affairs, community announcements, sports…things few "micropower" stations have offered.

Finally, those who are requesting a separate "micropower" class of license allege that obtaining a non-commercial educational license under existing rules is cost-prohibitive. I would disagree. Transmission equipment, audio processing and control devices can be purchased for less than $5000. I would challenge anyone supporting this proposal to find any type-accepted equipment under their proposal for lower cost. Those who want to offer "alternative" programming have the existing option in their community by forming non-commercial 100-watt FM stations through petition to the Commission for licensure. Plus, the restrictions on tower height, etc., make the coverage area of such stations roughly equal to those proposed in this rulemaking request.

I would emplore you to take a close examination of the "micropower" proponents. Please compare their names against the list of individuals who have already shown their disdain for existing Commission rules by broadcasting illegally. Most of the higher-profile cases have justified their transmissions by saying FCC regulation was "illegal" or "immoral>" If

this is so, it is unlikely any new regulation would be considered differently.

Dated this 27th day of April, 1998.

Gary A. Barrett
1534 3rd Avenue SE #3
Cedar Rapids, IA 52403