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**MAY - 4 1998**

**FEDERAL COMMUNICATIONS COMMISSION  
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May 4, 1998

**BY HAND DELIVERY**

Magalie Salas, Esquire  
Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, DC 20554

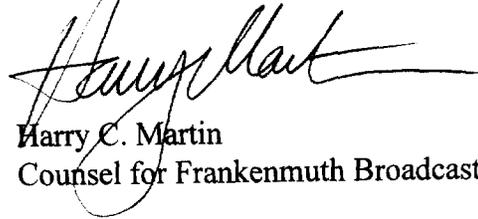
Re: RM No. 9242

Dear Ms. Salas:

Transmitted herewith in duplicate are Frankenmuth Broadcasting, Inc.'s informal comments in regard to the above-referenced rulemaking petition.

Should any question arise concerning this submission, please communicate with the undersigned.

Very truly yours,



Harry C. Martin  
Counsel for Frankenmuth Broadcasting, Inc.

HCM:mah  
Enclosure

cc: Mr. J. Rodger Skinner, Jr. (w/encl.)

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**WKNX**

4/24/98

Federal Communications Commission  
1919 M Street NW  
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MAY - 4 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

re: LPFM (Low Power FM Radio)

My name is John Blehm. My wife, Kathy, and I are life long residents of Saginaw County, Michigan. In 1994 I formed Frankenmuth Broadcasting, Inc. to buy an AM daytimer, WKNX. We also pioneered an FM radio station for Frankenmuth Michigan. After spending over \$10,000 on FCC fees, engineering and legal counsel the station will be built by out-of-towners who were able to bid more than me during the recent settlement window. In the future all licenses will be awarded to the highest bidders, most of whom will have no connection to the proposed community of license. Even though WKNX has a track record of local programming that serves the "public Interest", the government will be awarding licenses solely on the basis of deep pockets.

This "auction" philosophy along with recent ownership rule changes is making it next to impossible for the average citizen to own and operate a station.

Since WKNX is a daytime station, at night we are unable to broadcast emergency weather conditions, high school sporting events or any local programming of interest to this community. Not only do I see establishment of a new LPFM service as a solution to the "nationalization" of local radio, I feel AM daytime stations should have priority at receiving licenses for LPFM stations, provided the owner lives within 30 miles of the community of license. The AM could simulcast on the LPFM, thus providing better daytime reception, while providing critical service to local communities at night.

There are already many LPFM stations. They are known as "pirates". It is not fair for those of us that are legal to share the airwaves with pirates. I don't think the number of pirate stations shows a need for LPFM, but if the air waves are owned by the government (citizens) then the FCC should make LPFM spectrum available to local broadcasters who want to use it legally to serve local needs.

Respectfully,



John W. Blehm  
President