

CERTIFICATE OF SERVICE

I Scott D. Hicks do hereby certify that a true and correct copy of the foregoing : Reply-Comments on **RM-9242** was sent via first-class mail this 26th of June, 1998 to the following parties:

Henry L. Baumann, Executive Vice-President & General Counsel,
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Counsel for USA Digital Radio, L.P., Robert Mazer, Albert Shuldiner,
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American Community AM Broadcasters, Inc. (ACAMBA), Bryan
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RM 9242 Petitioner, J. Rodger Skinner Jr./President, TRA
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Office of the Secretary
Federal Communications Commission
Room 222
1919 M Street NW, Washington DC 20554

June 26th, 1998

**Before the
Federal Communications Commission
Washington DC 20554**

In the matter of
Proposal for creation of the Low Power FM (LPFM) Broadcast Service

FCC RM-9242

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To: Federal Communications Commission

Reply Comments of Scott D. Hicks

When I listen to the radio in my own home market area of Detroit, MI I very rarely hear any advertising from businesses in my community. In fact I have spoken to business owners and the majority say that the very cost of advertising is prohibitive. Most advertising is limited to national chains that can afford the dollars to advertise. This situation has been disastrous to our local economy. Back in the 70's and early 80's clubs and small business's thrived in our local economy mainly due to cheap advertising on radio and television but today they are so squashed by national interests they are unable to compete and many have closed their doors for good. Ross Perot was right about the giant sucking sound he talked about so frequently during his campaign for presidency but he was wrong about the geography.

The big international corporations have found a new way to hold that vacuum cleaner over us and suck every last cent they can out of our local economy. Most businesses, including my own, have been fighting back the only way we can. We have learned to use the underground media sources to get to the small percentage of the public that we can. This effort has worked so far but it has a very limited effect. The airwaves belong to the people of this country and not to the corporations to use them to fleece us for every dollar they can. We need an alternative form of broadcasting now more than ever if our businesses are going to survive in the new age. Give us back what belonged to us in the first place. Low power FM would create more competition and bring down the cost of advertising.

Greater Media has stated that the FCC would have trouble regulating all of the stations that would come into being. This argument is absurd. Most stations want to comply with FCC regulations and would gladly do so to remain on the air. What's amazing about this argument is that the FCC sure isn't having trouble finding the personnel to bust the existing LPFM stations and the ones that are trying to start up now. If we allow for re-licensing of LPFM stations, the agents can go back to doing their regular jobs of maintaining compliance. We have also heard the argument that there would be too many stations on the dial. This is also wrong. In most

market areas there is plenty of room on the dial for new stations. As for interference, the LPFM stations would not be anywhere near the high power stations. If there isn't room on the dial in a particular market area, a LPFM broadcaster will simply have to wait for space to open up or move to a new area, it's that simple. There may be a surge of new LPFM stations at first but only a small percentage would stay in for the long term. Most arguments against LPFM are purely from an economical point of view. No matter what they say, **the big broadcasters are afraid of the competition**. They have suggested the Internet as an alternative to radio but it is not a viable media for this type of format since the quality is very poor for audio/video transmission and the majority of people do not search the net for music and video.

We must not forget that the modern radio came from very humble beginnings and was borne out of the entrepreneurial spirit that the media giants of today are trying so hard to squash with the help of the FCC. If it had not been for the success of Guglielmo Marconi at transatlantic radio communication in 1901, the radio of today most certainly would not exist. He was an entrepreneur extraordinaire of his time. Let us also not forget that most of the advances in radio technology came from amateur operators that kept communications open during WWI to assist in emergencies when other forms of communication failed. Amateur operators also launched the first non-governmental satellites and were the first to provide direct communication between the US and the Soviet Union. In fact most of the advances in modern radio today were at the hands of amateurs. These are the people who are most likely to innovate and advance the medium. It is this very innovative entrepreneurial spirit that is so needed in radio today.

The big media companies have been telling us for the last few years that with more stations under their belt they can afford to experiment with different formats and to show some creative expression, yet the truth is far from what they profess. I have spoken with many bands that travel around the country and they tell me that, to their dismay, they hear less diversity on the dial. They find stations with the same names and the same daily lineups playing the same ten songs and the same advertisers hawking the same goods. Is this the kind of environment we want our children growing up in, to wear the same clothes, eat and drink the same foods, live the same lifestyles and have the same jobs. Search your hearts and I believe that you will find the answer. We need diversity in radio and in all areas of our lives. To days amateur radio operators will be to morrows generous contributors to society in a very unique way. They will learn to give back to the community what they got out of it and not just take for the sake of taking. Lets not take away the chance for our children to start a career that they dream of having. Would we tell a sixth grader learning to play the violin that they had to invest in a \$50,000 Stradivarius, or the young college student who wants to be an oceanographer that they must buy the Calypso just to enter the field. Lets not close the door on the American entrepreneurial spirit, or as some would call it "The American Dream". Lets allow all of our citizens to innovate and expand the horizons of all of our people.

As a Michigan entrepreneur, I support RM-9242.

Signed:

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