

Country Jam

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101 S. Egan - Box D

Madison, SD 57042



AM - 1390
FM - 103.1 Stereo

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March 8, 1999

MAR 18 1999

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Enclosed is an original & nine (9) copies of comments regarding MM Docket #99-25.

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Dear Commission:

RE: MM Docket # 99-25

As background on myself, I received a first class FCC Radio/Telephone license in 1959 and since have built, engineered, managed, purchased and operated with my wife an AM & FM station in a community of 6,500 people & a county population of 10,500 in South Dakota.

Would low power bring diversity in ownership – No

The idea behind 80-90 was that it would bring new people into broadcasting especially minorities. In 1993 there were 200 blacked owned U.S. Radio Stations – 2% of the total stations on the air. Six years later there were 168 (32 fewer) – 1.6% of the total.

Would the public be served – No

As with the situation of 80-90, most of these stations were licensed to very small communities. What happened is people who thought they could make them financially successful have either moved their studios & public awareness to the neighboring larger community, or turned the station into a satellite feed jukebox which provides nothing to the community. We have heard weather forecasts that are 1 ½ days old because there are no operators – they're at home for the evenings & weekend.

On the matter of weather, let me site an example of the devastating Spencer, South Dakota tornado the night of May 30th, 1998. Our Stations are live, a local Re-Act member is at our studios behind a mike relaying to our audience and Eastern South Dakota what his people in a 3 county area are seeing in the field. We have 2-color radars plus National Weather Service Radio & Teletype.

For Radio to do what the Commission feels it should be doing, it must have the commitment of the Broadcaster, but it also take money. Money to buy the backup AM and back up FM transmitters, money to buy the switching equipment, the 3 standby generators (one at each transmitter site & studio), money to maintain this equipment and money to have trained professional people on the air to report these weather conditions.

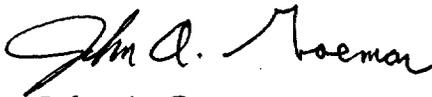
Low power Broadcasters won't have the moneys to provide service to the public.

In North Dakota during the floods of the Red River, the tornadoes of Texas or Tennessee or the hurricanes of the Coasts – it's Radio that has saved lives with warnings and provided the information after the storm for homes and families to rebuild.

Low power stations will not have the expertise to maintain the operating perimeters of the transmitters nor the sufficient advertising base to maintain the equipment resulting in degradation of the spectrum.

With the proliferation of the internet, cable, HDTV, Satellite radio, CD's & etc, Low Power Radio will not and cannot serve the public and will not only degrade the spectrum, but also the existing full service radio we have left in the country.

The entire infrastructure is in place in the Educational Radio & TV band in this Nation. Rather than these stations running entertainment programs like the Grand Ole Opry, Lawrence Welk re-runs, jazz & classical music, divide up their hours, if there really is a scarcity of voices or opinions, and use the educational stations for what they were originally put in place for. They certainly have more coverage than low power stations would have and there would be no more interference in the spectrum.



John A. Goeman
General Manager/Owner