
Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the matter of)

Creation of a Low)
Power Radio Service) MM Docket No. 99-25
)
) RM-9208
) RM-9242

Comments of
KROC AM/FM RADIO/SOUTHERN MINNESOTA BROADCASTING CO.

TO THE COMMISSIONERS:

Please accept these comments from Southern Minnesota Broadcasting Company (SMBC) concerning the issue of Low Power FM. It is the opinion of SMBC that the request for Low Power FM, while well-meant, is a bad idea for the end-user broadcast consumer. Please consider the following arguments.

1) Low Power FM will cause interference to existing stations. For the past 25 years, our stations have experience numerous interference and signal reception problems. An already crowded dial and existing and evolving topography has provided our community of listeners with already untenable reception challenges. In order to establish a low power service, the FCC would have to drastically alter its existing interference protection standards. The interference protection standards are in place to maintain the integrity of the spectrum. Elimination and/or alteration to the standards will results in even increased interference to existing broadcaster's signals, and a loss of service to listeners.

2) Low Power FM will harm the development of In-Band, On-Channel (IBOC) digital radio. The proponents of IBOC digital radio have been developing their systems based on the current interference protection standards. The systems utilize the "sidebands" of the analog signal to transmit the digital signal without the need for additional spectrum. Any alteration to the second-adjacent channel spacing restrictions could harm radio broadcasters in their transition to digital.

3) Low Power FM proposal will not achieve what the Commission wants. Even if the commission eliminates second and third adjacent channel protections, very few stations would be available. The Commission claims that it received over 13,000 requests for low power stations last year. Unfortunately, under this proposal, or any proposal, there will never be enough spectrum for even those persons to have their own stations.

4) Low Power FM will not create viable stations to increase minority and female ownership. Even if it is determined that a station is available in a particular area, there is no guarantee that minority and female owners will want or will actually receive a license. In our already over-radioed market, the economic viability of even more, low power stations is very questionable.

5) Those who don't know history are doomed to repeat it. In the 1980's the Commission began a proceeding that ultimately ended in the revision of it's rules that allowed thousands of new stations on the air. The result of the infamous "Docket 80-90" was that there were too many station the marketplace. The Commission subsequently loosened radio ownership restrictions in order to bolster the industry. It was the resulting consolidation that gave us the situation this proposal now hopes to solve. Allocating thousands of new stations now cannot help but further worsen the situation.

6) Low Power FM will be an administrative nightmare for the FCC. The Commission has limited resources. This notice proposed to provide assistance to LPFM applications-assistance unlike any ever provided to full-power applicants. The addition of thousands of stations would also add increased regulatory and enforcement burdens to the Commission.

7) Low Power FM proposals for 1-10 watt stations are inefficient use of the spectrum. In more wide-spread geographic places like Minnesota, it is inefficient to try to reach a large number of people using low-powered facilities. It would be much more efficient use of spectrum to use the fewer full-power signals now in use that can reach larger numbers of people more efficiently.

Thank you for your consideration of this important issue.