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March 22, 1999

FCC MAIL ROOM

Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

**Re: Informal Paper Comments Regarding LPFM Radio Service  
MM Docket No. 99-25**

**RM-9208  
RM-9242**

Dear Mr. Secretary:

My name is Lloyd B. Roach. I am the licensee and 100% owner of WCOJ-AM in Coatesville, Pa. This November WCOJ, a 5,000 watt full time AM station will have been serving this area with pride, for 50 years. I have spent my entire professional life in radio broadcasting. In addition to ownership of this station, I am the former licensee of WCZN-AM, Chester, PA. I was also the VP/General Manager of WPLY-FM, Media, PA, WCMB-AM/WSFM-FM, Harrisburg, PA and WEFM, Chicago, IL. In addition I have held management posts at 8 other radio stations throughout the US. I have significant experience in engineering of AM arrays, FM startups and station operations. I also operate a radio broadcasting consultancy firm called, **Radio OP** based in West Chester, PA.

My reason for writing is to discourage the FCC from adopting the Low Power FM proposal, MM Docket No.99-25, RM-9208 & RM-9242. Here are my reasons:

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1. If you wish to provide access for minorities and other disadvantaged peoples, why not suggest to them they build a website. The Internet is a far more powerful political tool than a low powered community radio station.
2. In the Philadelphia Arbitron Metropolitan Survey Area, where I and dozens of other AM stations must compete, over **79%** of the AQH listening 12+ is on **FM**. Adding **more** signals to an already crowded FM band here will only reduce the ability for directional, regional AM stations such as WCOJ to attract listeners. AM radio's FCC mandated inability for audio quality parity places an even greater burden on small community radio stations such as WCOJ.
3. In 1986 at great personal expense, as the former licensee of WCZN-AM and at the urging of the FCC and NAB staff, I converted my station to AM-Stereo. I do not need to explain the folly of that experience. This was yet another set back for AM radio.
4. In the early 1990's the FCC proposed the *Expanded AM band* to permit additional stations for, you guessed it, *minority operators*. The original idea was soon abandoned and less than 80 assignments were ever made. It is interesting to note that many of the new channels ended up in the hands of large consolidators. By the way, **not one** assignment was made in the Commonwealth of Pennsylvania.

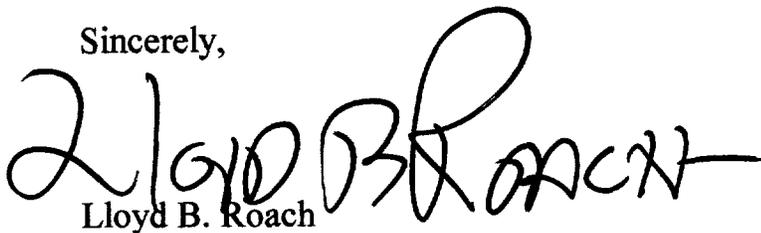
Now the FCC is proposing additional FM stations which may cause interference to existing stations and will clearly transfer even **more** local listeners from the already suffering AM band.

Please don't take us down this road of experimentation, failure and folly again. Stations such as WCOJ do a superb job in providing local access to people in our market. I'm sure I speak for hundreds and hundreds of independent operators when I say, "**Don't do it!**". If you want to help us at all, including disadvantaged peoples, immediately approve a standard for IBOC Digital Radio on AM and FM. This will create a level playing field and make opportunity better for everyone.

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If further information is required from WCOJ, you may call me directly at 610-384-2100, My e-mail address is [Lloyd@wcoj.com](mailto:Lloyd@wcoj.com).  
up.

Sincerely,

A handwritten signature in black ink that reads "Lloyd B. Roach". The signature is written in a cursive style with a large initial "L" and a long horizontal stroke at the end.

Lloyd B. Roach  
President/Owner  
WCOJ Radio Company, Inc.