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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
William Lewis Coleman, Chief Operating Officer Team Radio LLC

As a second generation broadcaster who is now in his 23rd year of service to a great industry, I must address my extreme concern over the proposed "microradio" plan before the commission.

First off, all of my FM stations are at 3000 or 6000 watts, which in itself is almost a version of "microradio." These stations are already receiving enough interference as it is. The proposed rulemaking would only create more interference to an already crowded FM band. The way the rulemaking stands now, the majority of new stations would be in rural areas such as mine. This only means more interference to current "microradio" operators such as myself. I fully understand and appreciate the intent to allow for low power broadcasting to serve minorities in urban areas. This proposed rulemaking actually allows

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for very few stations in the urban areas, and a mass amount in rural areas. I don't think this was the intent of the rulemaking.

As I look to the future and the development of IBOC, which will undoubtedly serve our public better, my excitement is high. As I look at the proposed rulemaking for microradio, my excitement for IBOC disappears because the spacing required for IBOC will be used by microradio stations. IBOC can't work if this rulemaking proceeds.

It is an extremely competitive marketplace today. The current line-up of AM and FM stations are having difficulty in becoming economically viable. What will these new microradio broadcasters find as they too join us in the fight for economic viability?

Please check with any broadcaster about the 1980's and what docket 80-90 did for the radio industry. The docket 99-25 plan is very similar to that. I know in my market, docket 80-90 created one new station which has since been in bankruptcy twice. One other station in the market went into bankruptcy in 1988. Radio stations cannot serve the public if the competition comes to the point where there is not any hope for an economic situation that would allow the stations to remain on the air.

In 1978, the Commission decided that 10 watt non-commercial FM stations would no longer be allowed to come into service. In 1978, the Commission decided that the FM spectrum would best be used by larger stations that can reach more of the public. This remains true today.