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Before The  
Federal Communications Commission  
Washington, D.C. 20554

In The Matter Of LPFM  
Low Power FM Service

MM Docket No. 99-25

Comments Of  
Sierra Broadcasting , Corporation

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There are a number of major concerns regarding the implementation of Low Power Fm Service in our market area. Although technical related concerns are An issue in many markets, the fact is, in our Northeast California market, LPFM Can be introduced without interference to existing services because of the Availability of spectrum in our remote market area.

However, that also becomes our reason for our opposition to LPFM. Yes , they Will fit, however, under the current rules there is plenty of room in our market For additional commercial FM services – all classes. It would be relatively Inexpensive for an applicant to secure a channel and build a Class A FM service In this market.

It is our belief that LPFM will not achieve the desired objective of the Commission. Even if the Commission eliminates second and third adjacent channel protections, Very few stations would be available in the urban markets. Serving these urban Markets is very much a primary objective of LPFM, which would not be realized.

Let's look at what history has shown us. In the early 1980's the Commission Approved and implemented thousands of new FM stations under the Docket 80-90 ruling. Following this, the Commission loosened ownership restrictions allowing consolidation. Docket 80-90 was the direct cause of consolidation. Essentially isn't the Commission repeating this mistake by now promoting Thousands of new Low Power FM operations to enter the marketplace?

Has all of the impacts of this new LPFM service been considered? Assuming The Commission has limited resources , isn't the regulatory and enforcement Burden – not only for the newly licensed LPFM stations, but also for all of The existing unlicensed "pirate" radio stations that refuse or are unable to Obtain licenses and continue to broadcast an overwhelming proposition?

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The FCC proposal won't accomplish its goal even when removing all of the Interference restrictions to allow more room for LPFM stations – there will Still be very few available in the urban markets. Further, there is absolutely No need to establish this service in rural markets where there is an Abundance of channels available.

Quincy 92.1 FM Stereo	Chester/Lake Almanor/Greenville 94.3 FM Stereo	Portola/Loyalton/Graeagle 93.3 FM Stereo
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