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MM 99-25

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QUINNIPIAC COLLEGE

AM 1220 WQUN

To: Federal Communications Commission
Re: MM Docket 99-25
To: Office of the Secretary, TW-A306
Federal Communications Commission
445 Twelfth Street SW
Washington DC 20557

Comments from Quinnipiac College, Hamden CT, licensee of commercial AM station WQUN 275 Mount Carmel Ave., Hamden CT 06518 -- Michael Collins, general manager (203) 281-8984

Here are the comments of Quinnipiac College/WQUN regarding Docket 99-25

1.) In the commercial FM band, there should be only "one to a customer" for these precious licenses (the new community FM stations), since the radio band is limited and there are so few frequencies. This would ensure that these stations would be owned by community groups with local service. The changes in ownership rules have led to the destruction of a great deal of local news service in the last 15 years, starting with the elimination of the 3—year ownership rule.

2.) The last commercial license given out on the AM and FM bands in this market, the New Haven market, occurred when President Dwight David Eisenhower was president. The last commercial radio license given out on the AM and FM bands in

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New York city occurred when President Dwight David Eisenhower was president.

3.) Since the broadcast band is so limited, preference should be given to community stations over translators and repeaters which simply relay out-of-town stations. Community stations should be able to "bump" translators. But they should not be given priority over Class D FM stations in the commercial band, since they are local stations originating local programming.

4.) The new community stations operating in the commercial band should be commercially licensed, so they can obtain advertising to support their operations, without restrictions.

5.) In the event these stations are sold, they cannot be sold to any entity which owns other commercial stations.

6.) The licensee must work or live or be based within 25 miles of the community station.

7.) Preference should be given for AM stations operating with less than 500 watts at night, and daytime only stations, similar to what was done in the Docket 80-90 proceeding.

8.) Again, in the northeast corridor, there is an extreme scarcity of FM channels. In the Hartford/New Haven Designated Market Area, there are only 11 commercial Class B stations. Of the 11, 5 are owned by a single Texas—based company, and 3 are owned by a New York—based company. Therefore, the new community stations should be shielded from group owners and investor oriented owners, and the one—to—a—customer rule imposed.

9.) Although concern is being expressed about possible interference, I found that in the early 1990s, when there was a proliferation of FM translator stations to relay educational and religious stations, I contacted various broadcasters in the northeast, and there was little or no response or evidence of concern.