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

In the Matter of

Creation of a Low Power  
Radio Service

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MM docket No. 99-25

RM-9208  
RM-9242

Comments of  
WHIZ AM 1240 and WHIZ FM 102.5

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Zanesville, OH 43701  
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An NBC Affiliate

**Allan Land**  
President  
General Manager



April 6, 1999

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Federal Communications Commission  
445 Twelfth St., S.W.  
Washington, D.C. 20554

Dear Commission Members:

My comments are in regards to my concerns about Low Power Radio. It appears to me that the two reasons Chairman Kennard has proposed this idea are minority ownership and stronger community service. This plan sounds eerily similar to another plan. In the 1980's, the Commission began a proceeding that ultimately ended in the revision of its rules that allowed thousands of new stations on the air. The result of "Docket 80-90" was that in many instances we have too many stations in a marketplace. The intentions were to create a climate for radio to prosper. Unfortunately, an alarming number of radio stations were failing which caused stations to turn toward alternative programming, losing their local touch, cutting jobs, and cheapening radio. The commission subsequently loosened radio ownership restrictions under the Telecomm Act of 1996 in order to bolster the industry. In essence, Docket 80-90 was a direct cause of consolidation. Today we have less minority ownership and less local commitment, the exact opposite of Commission intentions.

Also in 1978 the Commission altered its rules to prohibit further licensing of 10-watt Class D noncommercial educational stations because it determined the spectrum could be used more efficiently by larger stations that can reach more people. The results of the 80-90 legislation and the Commissions findings in 1978 show the FCC proposal will not accomplish its goal of providing stations to the thousands of people who want one. Even if the Commission removes all of the interference protection restrictions to allow more room for LPFM stations, there will be very few available in the urban markets. Further, there's no need to establish such a service for rural areas because under existing rules, there are still many channels available. One of the reasons there are still channels available in rural areas is because stations are not as economically viable. **It seems to us this situation would be true for LPFM stations.**

Another item that causes alarm, is the interference issue these stations will have with existing stations. In order to establish a low power service, the FCC would have to

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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 result in increased interference to existing broadcaster's signals – and a loss of service to listeners. The LPFM proposal would allow some LPFM stations to operate under less regulation than full-power stations. Does the Commission have the resources to administer and enforce spectrum integrity to hundreds of new stations? My fear is that new licensees will have no experience in operating a station and won't be concerned with operating under any regulations.

We respectfully request the LPFM proposal be tabled until the Commission can conduct more research and further comment can be voiced by the public.

A handwritten signature in cursive script, appearing to read "Henry C. Littick".

Henry C. Littick  
WHIZ- Zanesville, Ohio