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

In the Matter of	)	
	)	
Creation of a Low	)	MM Docket No. 99-25
Power Radio Service	)	
	)	RM-9208
	)	RM-9242

Comments of
Clear Mountain Air Broadcasting Company

Clear Mountain Air Broadcasting Company is the licensee of KKBN-FM in Twain Harte, California. We came into radio the hard way. We personally calculated where there would be room for a new FM Radio station on the dial. In the days before computers it was done with maps, geographic coordinates and a scientific calculator. We then wrote our own petition the FCC to have the Table of Assignments modified to add this new channel assignment. When our petition was finally granted, we then competed with five other applicants for the right to build the new station. We have continued to own and operate KKBN-FM since 1985.

We may be one of the last of the independently owned "Mom & Pop" radio stations in the country. In the last fifteen years we have faced - and continue to face - a growing number of threats to our survival. We've battled corporate radio competitors... seen the introduction and the expansion of audio on the Internet... coped

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with new subscriber subsidized cable radio and satellite TV audio services. Soon we'll also have satellite radio service to compete with for the listener's ear.

While our listeners have been presented with a dazzling array of programming choices, Clear Mountain Air Broadcasting Company has been able to maintain its existence through a strong commitment to local service. We placed an increased emphasis on local news, public service and event sponsorships. Other broadcasters took a less high road to attract and retain their listening audiences. While we remain intensely proud of our own broadcast programming - we have become increasingly concerned at how low some other broadcasters will go to attract an audience. And these are licensed, (and at least in theory) responsible broadcasters... who value their licenses, their reputations and their businesses as much as we do our own.

Our concern as broadcasters - and also as a citizens - is how can the FCC even contemplate the proposed Low Power Radio Service which would allow such mass unregulatable access to the public's precious airwaves?

We never appreciated the regulations, restrictions, burdensome paperwork and exorbitant fees that were placed on us as radio licensees. But now we can better appreciate the benefits of regulation - because we've gotten a look at the alternative - the frightful future the FCC envisions for FM radio: There's literally a radio station for every neighborhood...no burdensome requirements to live with... there is no commitment to the community required... no experience is required (in fact present owners need not apply)... and best of all there is no way the FCC is going to be able to figure out if you are operating legally - or illegally - so anything goes!

Listeners will learn that radio programming is no longer a reliable source of credible information. For-profit opportunists will hit a community up for money and then run. Less ethical non-profit operators will use their new found tool to exploit, incite, and provoke the passions of listeners to further their own selfish agendas.... whatever they may be.

As operators of a Class A FM station in the Central Sierra Nevada, Clear Mountain Air Broadcasting Company is familiar with the problems of multi-path, shadow areas and interference on signal integrity. The concerns that many of our peers have over the proposed new Low Power Radio Service are based on spectrum integrity. We believe that concern is dwarfed by our own concern for the future of the Integrity of FM Radio as a reliable and responsible source of free information for the public.

We strongly urge the Commission to consider Low Power Radio Service on a case-by-case basis, applying the same stringent technical and ownership standards that it would for the introduction of any other FM radio station. When and if there are Low Power Radio licenses granted, they should be required to adhere to the same operational standards as other broadcast stations.

Radio isn't a toy.

Radio isn't a business.

Radio isn't a soapbox.

Radio isn't the voice of Government.

RADIO IS A RESPONSIBILITY!

At Clear Mountain Air Broadcasting, we take our responsibility very seriously as stewards of the public airways. We urge the Commission to also be responsible and reject the rules for Low Power Radio Service as presently proposed.

Respectfully submitted,

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