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April 2, 1999

Office of the Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

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RE: MM Docket Number 99-25

Dear Sirs,

This letter is to address the FCC's proposal to open up America's airwaves to Low Power FM broadcasters-the single greatest threat to the radio industry in its' entire history. . . and to millions of radio listeners.

As a stockholder and general manager of two "hometown" radio stations in western Colorado, I work with colleagues, advertisers, and a listening audience who don't generally know about all the formalities and legalism involved with the daily operations of our government. They're just regular people who try to run their lives and their businesses with a good dose of common sense, and so do I. So perhaps the best way to look at this proposal is with common sense, the one thing it is seriously lacking.

First, let's look at those people who are the reason why all radio stations (and indeed, the FCC) even exist. . . the listeners. In any business, any decision, no matter how large or small, that fails to put the customers needs FIRST just lost money for that business. Period. It's that simple! Low power FM puts first the needs only of its' owners. By opening the airwaves to so many additional signals, the integrity of existing broadcasters signals will obviously be degraded or, in certain areas, lost entirely. Common sense says that if the listeners can't receive the signal, they can't hear it. Common sense says that if the signal degrades into annoying half music-half static, listeners will turn it off. That situation does NOT put the customer's needs first, and neither does this proposal.

The related topic of station ownership by minorities again only puts the owner's needs first. In a country where all citizens should be equal, it is absolutely irrelevant who owns any particular business. As long as that business is conducted honorably and provides a legitimate product or service to their customer, the sex or color of the owner is completely unimportant. This is precisely the reason that affirmative action programs are currently breaking down all across the country. The FCC should stick to radio regulation, not resurrection of failed national legislation.

The next group to consider is the advertisers, the people who PAY for ALL broadcasting careers, the FCC included (no ads, no radio, no need for FCC). This proposal also fails to consider their needs. Very simply, if the station they choose to advertise with has been degraded or lost, they are advertising to nobody. They don't need

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to run ads that can't be heard. The result to the industry is obvious and catastrophic. All areas of business and industry in this country have a responsibility to continually improve what they offer, and currently the move toward digital broadcasting is the radio industry's effort to do just that. If approved, this proposal will send radio into a new "dark age" of declining quality, declining profits, and declining listenership.

Our third area of concern is, of course, the broadcasters themselves. The increased congestion and confusion that is sure to arise from further deregulation of the radio industry can only serve to send the profession into a tailspin from which it may never recover. Radio has barely recovered and regained strength after the infamous "Docket 80-90", another act of deregulation that resulted in tremendous upheaval and panic throughout the industry. Common sense says that shooting oneself in the foot once is usually sufficient to learn a lesson. Additionally, this proposal is an insult to all legitimate broadcasters in that it would grant amnesty and approved frequencies to operators of pirate stations. Common sense says that people who work hard to build a successful business within the framework of the law are the ones who should be rewarded, not people who have consistently and flagrantly violated the law. To legitimize and assist these criminals is a slap in the face to every broadcaster who has worked honorably to build a good reputation and a quality business.

As if all that weren't enough, common sense should dictate to the FCC that the administrative avalanche that would inevitably be created by this loosening of restrictions would be all but overwhelming. For your own sakes (and the sakes of the several forests of trees that would be needed to document this folly), this proposal must never be implemented.

Many members of America's community of broadcasters, myself included, are committed to growing as an industry in quality, in technology, and in professionalism. It is my hope that the FCC will have the common sense to JOIN us and HELP us in this endeavor.

Sincerely,



Gabe Chenoweth
General Manager
KMTS/KGLN

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