



Kentuckiana's Oldies Station

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April 12, 1999

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

REF: Creation of a Low Power Radio Service
MM Docket No. 99-25
RM-9208
RM-9242

Dear Secretary;

The purpose of these comments is to express concerns and share my opinions with relation to the proposal of LPFM. It carries the ability to destroy our ability as broadcasters to serve our communities.

As a small market broadcaster for close to 30 years, I feel I can make valid arguments against this proposal and its' effects in regards to community service by broadcasters, the interference issue and raise questions concerning the validity of creating opportunities for those who may have previously violated the law, along with addressing ownership allowances for LPFM.

Without amending the laws of physics, eliminating third-adjacent channel (and perhaps second-adjacent) protection will, by definition, cause interference. As it stands, the radio band is already congested. Interference is a serious problem and the ability of the FCC to police such a large number of new stations would require expansion of staff, when Capitol Hill wants reduction. Elimination and/or alterations to current standards will result in increased interference to existing broadcaster's signals - and a loss of service to listeners.

Availability to anyone who has been or is currently a known pirate is rewarding those who have violated the law. With the 13,000 inquiries showing an interest in LPFM, not all would be able to obtain approval as LPFM operators. With the FCC too busy dealing with a deluge of new stations, some pirates won't bother applying.

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To address the question of allowing ownership of even 5 - 10 nationally, this defeats the purpose of local "voices for the voiceless" and serving local communities. This would necessarily change the scope of ownership opportunity from emphasis on local service to one of a commercial nature.

In regards to the commercial or non-commercial aspect of these LPFM's, to ensure that small markets do not lose the marginally profitable stand-alones they now have, these stations, if approved, should have to operate as non-commercial entities. Current small market stations deliver local news and programming to their communities. With the addition of four, six or a dozen LPFM stations, even operating with volunteer staff, in these small markets would alter the revenue pie to the point that most would never come close to breaking even financially and force the existing stations to abandon local content to stay in business.

I respectfully request that the FCC conduct significant studies, which have not yet been done, to look at the interference impact of the proposed LPFM service before moving forward with elimination of second and third adjacent channel restrictions to make room for LPFM.

Sincerely,

A handwritten signature in cursive script that reads "Bill Walters".

Bill Walters
Owner, WASE