

In the matter concerning docket 99-25 it is my opinion that the licensing of low power FM radio stations should be adopted. With respect to the opposing arguments of licensed broadcasters--ie that the licensing of LPFM stations would create unfair competition and loss of listeners and advertising revenue--I can only say this: FM radio listenership has been on a steady downhill slide for the past ten years, and for good reason. With a relatively few large broadcast corporations owning the majority of the stations in most major markets, the trend toward one-size-fits-all ultra-niche programming has become the trend. And with the exception of talk-radio, on-air personalities have become little more than equipment baby sitters.

Whereas a radio station's identity used to be forged by its air staff's personalities, today stations are identifiable only by format. Format, as a general guide, is essential to building a station's identity. As formats narrow, however, creativity necessarily becomes stifled. And as more and more stations fall into fewer and fewer hands, the need to meet an ever increasing bottom-line most certianly arises. Thus, the inclination toward niche-programming.

If Acme Broadcasting can obtain eight radio stations in Detroit, they can program each station with a tightly focused format aimed at very specific demographic groups. By offering eight different--and totally predictable--formats in the Detroi