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APR 27 1999

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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

Talley Broadcasting Corporation

Licensee of WSMI and WSMI-FM

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We oppose any changes in protection rules presently provided FM stations for several reasons:

- 1. WSMI-FM serves farmers in about a dozen counties since we have a full-time farm director and offer the complete informational service that farmers require. Some of our farm listeners reside at as much as 60 miles from our tower.**
- 2. We have found that a tiny amount of power can create great havoc. This was demonstrated to us several years ago when another station had created a spike off its assigned frequency.**
- 3. A fellow Illinois broadcaster has reported devastating interference from a low power pirate on an adjacent or second adjacent channel.**
- 4. The FCC proposal will/would harm the development of In-Band On-Channel digital radio, possibly making it impractical.**
- 5. Low power FM stations are an inefficient use of spectrum. The commission realized this in 1978 when it prohibited further licensing of 10 watt Class D noncommercial stations.**

Very truly yours,

TALLEY BROADCASTING CORPORATION

A handwritten signature in black ink that reads "Hayward L. Talley". The signature is written in a cursive, flowing style.

Hayward L. Talley, President