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GENERAL COUNSEL
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MAY 21 1999

Federal Communications Commission
Office of Secretary

April 28, 1999

Commissioner Susan Ness
Federal Communications Commission
The Portals
445 12th Street, SW
Washington, DC 20554

Dear Commissioner Ness:

Thanks for an enjoyable conversation after the BMI dinner last week.

The Micro proposal could produce serious devastating consequences and is perhaps squararly on your shoulder.

If there is a shadow of a doubt, please don't let it happen.

Thank you very much.

Cordially,

Houston Pearce

Houston Pearce

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RADIO, INC. LONG ISLAND

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Federal Communications Commission
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April 26, 1999

Ms. Susan Ness
FCC Commissioner
445 12th St. SW
Room 8B115
Washington DC 20554

Dear Ms. Ness:

I'm writing to you, woman to woman, on an issue of great importance to me. As you're aware, the FCC is currently considering a plan to allow low power FM radio stations on the 2nd and 3rd adjacencies. I strongly oppose this LPFM proposal for a variety of reasons and I'd like to share my "front line" perspective with you.

Having been in the broadcast lending business, you no doubt are aware of the vast changes our industry has seen lately. In my 15 years in this business I've seen 3,500 start up stations sign on the air. I've seen new formats sprout daily and established music formats subdivide into sub-categories - now offering more program diversity than ever in a fiercely competitive radio market. In spite of relaxed requirements for public service and public affairs content, I've watched broadcasters continue their dedication to their local communities like no other communications medium, offering reliable, local, up-to-the-minute programming that truly serves the public interest - all at no charge to the listening public.

If the intent of LPFM is to foster diversity among station owners, operators and employees, let me assure you, this is not the way. For women like myself, the stability and training offered by my current and previous employers, provided an environment for me to grow and learn. I have worked very hard to enjoy the same opportunities available to my male counterparts -- eventually earning me the title of Vice President/General Manager with Cox Radio in Long Island, NY. I'd like to think that my training and work ethic helped me achieve this position ... not the fact that I am a woman.

The notion that low power stations will serve as "training ground" for full power stations is flawed - the resources simply will not be there to get properly trained people in the pipeline. If it is diversity you seek, then look to the new choices made available via the internet and satellite radio - the latter offering 200 channels (offered by only two companies, representing 100 channels each, mind you).

Finally, the purpose of the FCC was to police a finite amount of spectrum and ensure that interference to the listening public was minimal. This very tenet is defeated by the proposal of LPFM. If the FCC shoehorns hundreds - if not thousands - of radio stations into an already congested radio band, the only result will be more interference and less service to the listening public.

I'm counting on you to give this issue a fair and clear look. Thank you and please feel free to contact me directly should you have any questions.

Warm regards,

Kim Guthrie

Kim Guthrie
VP/General Manager
WBAB/WBLI/WHFM
Long Island, NY



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CITY OF VERNONIA

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May 11, 1999

Commissioner Susan Ness
Office of the Secretary
TW-A306
Federal Communications Commission
445 12th Street, S.W
Washington D. C. 20554

Dear Commissioner Susan Ness,

The City of Vernonia would like to express our support for FCC's effort to establish rules authorizing the development of low power, microradio broadcasting stations.

The City of Vernonia is located in the midst of the coast range mountains in Northwest Oregon. In 1996, the City experienced a devastating flood that damaged over 50 percent of the homes located within the valley. To make matters worse, both of the roads leading to and from town were flooded and the City was completely surrounded by floodwaters.

The only communication channel available to the outside world was via ham radio. Without this emergency communication, Vernonia would have been completely isolated. All radio communication came from the Portland area. Communication within the community was non-existent. Listening to a local broadcast to determine where or when to evacuate, where emergency supplies could be obtained, or, about other critical information needed during an emergency, was not available.

Even during normal day to day life, having a local LPFM service would be an invaluable asset to our rural community. Being located in a valley makes it difficult to capture other FM radio stations. In addition, having the capacity to communicate within the local community via radio would help increase citizen involvement and help build a more healthy, vibrant community.

If FCC authorizes low power microradiio broadcasting, we intend to develop a local radio station. We believe that a small community non-profit could own and operate a very successful LPFM service. This service could be managed by a small staff as well as volunteers from the local schools, Fire Department and others from within the

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In summary, we would encourage FCC to adopt rules that allow the operation of new, low powered LPFM broadcast radio stations.

Respectfully

A handwritten signature in black ink, appearing to read "Art Parrow". The signature is fluid and cursive, with the first name "Art" and last name "Parrow" clearly distinguishable.

Art Parrow
Mayor
City of Vernonia

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RADIO GROUP

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Federal Communications Commission
Office of Secretary

May 14, 1999
Commissioner Susan Ness
Federal Communications Commission
445 Twelfth St., SW
Washington, D.C. 20554

Dear Commissioner Ness,

I am the Chief Operating Officer of Adventure Communications, Inc., a small privately owned radio broadcasting company. We own 16 radio stations in small markets. As a broadcaster with 30 years of experience in all facets of the business I am very alarmed about the Low Power FM proposal, MM Docket No. 99-25. I urge you to take a close look. There are serious technical issues that have not been adequately addressed at this point. I am especially concerned about the following issues:

1. Interference to existing stations. The 80-90 docket filled up the dial in most markets. For example in the Savannah radio market 62 stations were rated in the last Arbitron survey. We are already faced with 2nd and 3rd adjacent frequencies effecting our day by day operations. The influx of low powered stations would create interference levels that would drastically impact our ability to serve our listeners. The current interference standards are in place to maintain the integrity of the spectrum.
2. Low Power FM will harm the development of In-Band, On-Channel digital radio. The proponents of IBOC have been developing their systems on the current interference protection standards. Any alteration to the second-adjacent channel spacing restrictions could harm radio broadcasters in their transition to digital.
3. EAS compliance. The EAS system is essential to getting important life threatening information to listeners at once. Each stations EAS system is expensive to purchase, time consuming due to instruction of the system application, and something that must be monitored 24 hours a day, seven days a week. The recent tornadoes in Oklahoma City would have cost even more lives if the well trained broadcasters in the market hadn't activated EAS and kept a constant flow of information coming to the listeners. How can anyone realistically expect "minor broadcasters" to maintain that standard?

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WLOW-FM WWVV-FM WFXH-FM WGCO-FM WGZO-FM WGZR-FM WFXH-AM

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4. Low Power FM will be an administrative nightmare for the FCC. The assistance proposed to LPFM applicants and the increased regulatory and enforcement burden will be overwhelming. We'll have amateur stations in the middle of a mature service which means the need for technical enforcement will be huge or total chaos will reign.

Is Low Power FM the most efficient use of the spectrum? In 1978 the Commission altered it's rules to prohibit licensing of 10-watt "Class D" non-commercial educational stations because it determined the spectrum could be used more efficiently by stations that can reach more people. Has anything changed since 1978 that would alter that premise?

Thank you for taking the time to read this letter. Please consider these facts and comments as you go thru the process of determining the Low Power FM proposal.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael J. Buxser", written over a printed name.

Michael J. Buxser
VP/Chief Operating Officer
Adventure Communications, Inc.