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OFFICE OF THE CHAIRMAN MAY 20 1999

Federal Communications Commission
Office of Secretary

Doc-99-25

April 14, 1999

The Honorable William Kennard, Chairman
The Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Mr. Chairman,

I am writing to add my voice to those expressing grave concern regarding the Notice of Proposed Rulemaking authorizing low-power FM, or "microradio." Although I realize you favor microradio in order to enhance broadcasting diversity, the evidence suggests that it would have the exact opposite effect. I urge you to reverse your position, and I ask the Commission to reject this proposal.

Many voices more articulate than mine have made the case against microradio based on a variety of arguments. For me, the issue comes down to two simple facts: first, microradio won't help the people it is supposed to help; and, second, microradio will harm, perhaps destroy, those broadcasters who today are striving to serve their communities. Let me briefly explain.

Will microradio help enhance broadcasting diversity? In theory, the answer is yes. By lowering the cost of admission, the FCC will *theoretically* allow greater coverage of diverse views, not to mention a potpourri of languages, musical styles, religious viewpoints and so on. But think for a moment about the reality, not the theory. Broadcasters, micro or macro, have to stay in business to survive. Apart from bake sales and carwashes, radio broadcasters make their living either selling advertising (or block program time) or asking for donations. Microradio stations in small-to-medium markets (and probably even in large markets) stand very little chance of

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The Honorable William E. Kennard

April 14, 1999

Page two

generating the kind of audience that would make advertising a cost-effective proposition. Moreover, there is little chance that very many of these stations could generate enough audience support to stay on the air. You are inviting small operators to buy a microradio license, invest in equipment, struggle a while to stay on the air, and eventually go dark. This is hardly the path to broadcasting diversity. It's akin to encouraging someone to open a mom-and-pop grocery store between a Safeway and an Albertson's!

In fact, there is little evidence to suggest that consolidation of ownership has restricted diversity of viewpoints. Here in Seattle, for example, since ownership consolidation began, the number of news and talk stations has grown from two to at least six! A simple flip of the dial will demonstrate just how diverse are the viewpoints of the hosts and the callers.

So if microradio won't really help those seeking a greater voice on the airwaves, what about the issue of harming existing broadcasters? There can be little doubt that, if microradio is approved, severe and perhaps fatal harm to some broadcasters would result. Ironically, those most able to withstand the challenge of microradio are the large groups that are supposedly shutting the door on diversity of viewpoints. The small and medium size broadcasters who now find it a challenge to break even would be extremely vulnerable to fragmentation of their audiences and incursion on their coverage areas.

Microradio will certainly create interference. It will fragment the audience. It will turn an already crowded FM dial into a hash of overlapping signals. And, to reiterate, it will do all that without accomplishing the very thing the proposal was designed to accomplish!

Please note that I write this from the perspective of one of those "divergent viewpoints." I am General Manager of three Christian radio stations, two in Seattle and one in Bellingham. If microradio's dangerous level of audience fragmentation and signal erosion should be allowed in our markets, or in the

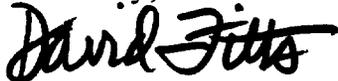
The Honorable William E. Kennard
April 14, 1999
Page three

many peripheral markets our stations serve, our broadcast ministry would be severely impaired. How would the FCC explain its position in favor of broadcast diversity to the listener in Oak Harbor, Puyallup or Ferndale whose Christian radio station was suddenly drowned out by a microstation playing polka music or heavy metal? By allowing one on the air, you have effectively silenced the other.

It is not my intention to belabor the point, but as I close I want to make it as clear as I possibly can that I am very afraid of the impact of this ruling. Please, Mr. Chairman, in your desire to achieve this noble goal of enhancing diversity on the FM spectrum, do not destroy the very institution the FCC was created to regulate. I plead with you and the Commission to seek other solutions. Solicit the input of the radio broadcasting community. But don't implement this ill-advised and dangerous plan.

Thank you for your consideration.

Sincerely,



DAVID FITTS

General Manager, CRISTA Broadcasting:
KCMS-FM Edmonds-Seattle
KCIS-AM Edmonds-Seattle
KWPZ-FM Lynden-Bellingham

cc: Senator Patty Murray; Senator Slade Gorton; Congressman Jay Inslee;
Congressman Jack Metcalf; Mark Allen, Executive Director, the Washington
State Association of Broadcasters; Cathie Valentine, Executive Director, the
Puget Sound Radio Broadcasters Association