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Federal Communications Commission
Office of Secretary

David P. Glass
Vice President
Director of Broadcast

March 24, 1999

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OFFICE OF THE CHAIRMAN

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

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Dear Mr. Kennard:

This letter is in response to what, at first glance, appeared to be an early April Fool's Joke. Unfortunately, it is no joke. Furthermore, it strikes at the heels of legitimate, community-minded responsible broadcast operators.

First, let me say that I do not work for CBS, Clear Channel, Jacor or Chancellor. I represent The Findlay Publishing Company... a small, independent operator based in Ohio. Therefore, this is not about "the big guys" fighting the system. This is about good, sound policy - which is absent from the FCC's proposal to create a low power radio service.

Clearly, the FCC has not done their homework on this critical issue. In order to establish this low power service, the FCC would have to drastically alter its existing interference protection standard.

Technically, we don't know the interference impact Low Power FM will cause; and what about the future? What challenges will this create with In-Band, On-Channel digital radio? The fact is, we simply don't know.

Please evaluate your objectives with regard to this proposal. This proposal lacks a definitive direction... a compass. I can't imagine going down the Docket 80-90 road again!

Proper reflection will conclude that this proposed service would not be an effective use of the spectrum, and thus, the so-called "voice for the voice-less" would not be served. Even in some markets where ethnic groups are scattered over a particular metro, a single LPFM will not deliver. However, if you check, you'll find there is not a single ethnic group that is not being served by radio.

In addition, there is no basis to provide for and/or guarantee minority/female ownership. It will, however, legitimize the pirate broadcast operator.

It is my considered opinion, that this proposal still requires much scrutiny to support its merits on both technical issues as well as it being sound policy.

The Findlay Publishing Company is charged with the responsibility of addressing the problems, needs and interests of the communities we serve. Please do not create more "opportunity" for radio to operate in the RED and deprive listeners of the level of professionalism we've worked hard to build.

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Findlay, OH

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