

WJON 1240 AM

98 COUNTRY 98.1 FM

OLDIES 94.9 FM

K93 92.9 FM

**WJON**

**WWJO**

**KMXK**

**KKJM**

RECEIVED

April 2, 1999

MAY 20 1999

EX PARTE OR LATE FILED

Federal Communications Commission  
Office of Secretary

The Honorable William Kennard  
Chairman  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

OFFICE OF THE CHAIRMAN

APR 8 10 54 AM '99

RECEIVED

MM Docket Number 99-25

Dear Mr. Chairman:

Doc. No. 99-0

I'd like to express my opposition to the FCC's proposal to legalize "microradio" or "LPFMs". As a veteran broadcaster with 22 years experience in small market radio, I've seen first-hand how a good local station can truly benefit its community. I've also seen the competitive landscape change dramatically -- with the influx of thousands of new stations since 1980 on one hand and the 1996 Telecommunications Act on the other. Through it all, Radio remains a difficult way to make a living -- with a relatively small margin for error.

Like it or not, to again "tilt" the playing field with microradio means that small market stations with a commitment to local service may no longer be able to afford to provide it. Why trade a station with a fifty year heritage of community involvement like ours for a group of small stations who may or may not have the same commitment -- and certainly won't have the resources and expertise that we've developed over the years?

Also, I understand that the vast majority of the LPFMs will not be available in larger markets because of significant interference issues. Since one of the major reasons for the microradio proposal is to provide alternative information and entertainment "voices" to the existing broadcast spectrum, it seems illogical that only a handful could be authorized in urban markets -- the very areas with the most diverse population! Instead, most of the microradio stations will be placed in smaller cities and rural areas where their economic survival is most in doubt -- but ironically where they have the greatest potential to damage existing commercial broadcasters -- through competition for listenership, revenue, or both.

WJON Broadcasting Company

No. of Copies rec'd 2  
List ABCDE

P.O. Box 220 • St. Cloud, MN 56302-0220 • (320) 251-4422 • Fax: (320) 251-1855

Finally, I can't help but wonder how the FCC can possibly regulate hundreds of new stations run by licensees with no experience in dealing with the myriad rules and regulations we broadcasters deal with on a daily basis. I truly believe it would become an enforcement nightmare for the Commission.

The concept of microradio is unquestionably well-intentioned -- but far too flawed at this point to warrant serious consideration. The damage done to the broadcast industry as a whole could be immense -- hurting many to serve a few. Please don't let this happen!

Thank you for your time and consideration of my views.

Sincerely:



Steve Stewart  
General Manager  
WJON Broadcasting Company