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March 22, 1999

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

Federal Communications Commission
Office of Secretary

Dear Mr. Chairman:

I am concerned and very much against the Notice of Proposed Rulemaking that the FCC has begun on the issue low-power FM, also known as micro radio.

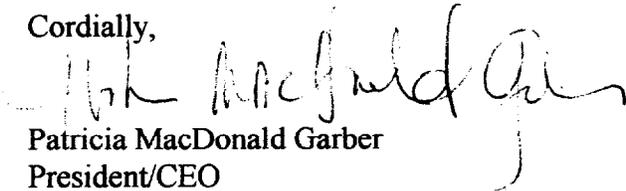
One of the major purposes of the FCC is to control interference. As I look at this issue, it is clear to me that the Commission is giving serious consideration to abandoning its interest in protecting against interference by looking to add these new low power stations. Where and how is the public better served by this?

As an operator in a city the size of 25,000 people, I know the real hardships associated with economic success with many radio signals, especially our AM radio stations. It is difficult to imagine what would occur adding more FM signals to the marketplace, low power or otherwise. The FCC right now has a spectrum in the AM band that has more than half of its owners losing money. It would be a disaster to add even **more radio** stations into the mix and maintain the integrity, and the economic feasibility, of it working. This is particularly true in the small market, the very markets that would get the abundance of low power FM allocations. Why not use the non commercial spectrum, or the hundreds of AM stations that are available?

In addition, the FCC has not properly contemplated the transition to digital. We are having a very hard time getting the current workload through the commission in a timely fashion; this will just add more delays to the already untimely responses to current action. If the FCC cannot handle the 10,000 or so commercial stations now, how in the world will it handle the additional low power FM signals, along with the transition to the digital signals?

I would urge you and your fellow commissioners to give serious consideration to placing any low power FM actions on hold until and unless these technical issues are resolved and rules are adopted for digital audio broadcasting, at the very least. Thank you.

Cordially,


Patricia MacDonald Garber
President/CEO

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