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FCC MAIL ROOM

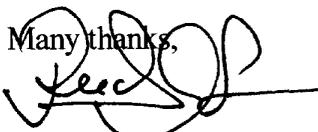
Office of the Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Comments Regarding LPFM
MN DOC: 99-25

Dear Sir/Madam:

Enclosed for filing, please find one (1) original and four (4) copies of Comments of Entercom Communications Corp. in the above docketed matter. Additionally, we enclose five (5) copies for distribution to each Commissioner. By separate cover, we have submitted a diskette to Paul Gordon and to International Transcription Service, Inc.

Finally, we have enclosed an extra copy with a self-addressed envelope. Please stamp the attached copy to evidence filing and return it in the enclosed envelope.

Many thanks,

Reed J. Slogoff, Esquire
Associate Counsel

cc: Joseph Field
John C. Donlevie
Paul Gordon
International Transcription Service, Inc.

RJS:mcr

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ENTERCOM COMMUNICATIONS CORP.

401 CITY AVENUE, SUITE 409, BALA CYNWYD, PA 19004 (610) 660-5610 FAX (610) 660-5620

- Seattle** KBSG AM-FM/KIRO AM-FM/KISW-FM/KMITT-FM/KNDD-FM/KNWX-AM
 - Portland** KFXX-AM/KGON-FM/KKSN AM-FM/KNRK-FM/KRSK-FM/KSLM-AM
 - Sacramento** KCTC-AM/KDND-FM/KRXQ-FM/KSEG-FM/KSSJ-FM
 - Gainesville /Ocala** WKTK-FM/WSKY-FM
 - Boston** WAAF-FM/WEEI-AM/WEGQ-FM/WRKO-AM/WWTM-AM
 - Kansas City** KCMO AM-FM/KMBZ-AM/KUDL-FM/KYYS-FM/WDAF-AM
 - Rochester** WBBF-FM/WBEE-FM/WEZO-AM/WQRV-FM
 - Longview/Kelso** KBAM-AM/KEDO-AM/KLYK-FM/KRQT-FM
- Sports Radio Networks:** Seattle Mariners Seattle Seahawks Boston Red Sox Boston Celtics Kansas City Royals

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FCC MAIL ROOM
In the Matter of

Creation of a Low
Power Radio Service

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MM Docket No. 99-25

RM-9208
RM-9242

**COMMENTS OF ENTERCOM COMMUNICATIONS CORP.
REGARDING PROPOSED CREATION OF NEW LOW POWER RADIO SERVICE
WITHIN EXISTING FM BAND**

Entercom Communications Corp., a Pennsylvania Corporation (“Entercom”), submits the following Comments Regarding the Proposed Creation of a New Low Power Radio Service Within the Existing FM Band, in response to the proposed rules of the Federal Communications Commission (“FCC”) set forth in the Notice of Proposed Rule Making released on February 3, 1999 (“NPRM”).

Entercom opposes the adoption of a new, low power FM radio service (“LPFM”). A new LPFM service would cause substantial interference to existing broadcast facilities thereby depriving listeners of access to their favorite programs and broadcast personalities and could interfere with the proposed digital enhancement of radio broadcasting. The National Association of Broadcasters is sponsoring a comprehensive study to evaluate the various impacts of the proposed LPFM service. At a minimum, the FCC should refrain from taking any action pending completion and comprehensive review of that study.

The NPRM would alter existing interference protection standards with respect to third, and possibly second, adjacent channels. Those standards are designed to maintain the integrity of the radio spectrum by precluding interference to the desired frequency and assuring listeners an interference-free environment not generally available on AM stations. Any relaxation of current

interference standards will result in increased interference in derogation of listeners' reasonable expectations of accessibility and interference-free quality. It would also conflict with longstanding FCC policy to minimize technical interference, as recently expressed in FCC rules seeking to achieve a more interference-free environment on the AM band by transitioning stations to frequencies above 1600 kHz. Furthermore, it should be noted that present interference standards do not adequately protect portions of metropolitan populations which have followed the expansion of metropolitan areas to outlying suburban areas. The loosening of those standards would predictably degrade the already marginal ability of those populations to stay connected to the metropolitan areas' leading voices.

The National Association of Broadcasters is sponsoring a comprehensive study to evaluate the various impacts of the proposed LPFM service. At a minimum, the FCC should refrain from taking any action pending completion and comprehensive review of that study.

The interference created by a new LPFM service may also impede the development of In-Band, On-Channel Digital Radio ("IBOC"). IBOC digital radio has been developing based on existing FCC interference protection standards. These IBOC systems propose to utilize the space within the emission mask of the analog channel. The digital signal is added at a low level in the side bands of the adjacent channels, thereby eliminating the need to utilize other scarce frequencies within the electromagnetic spectrum and saving them for alternative uses. However, any relaxation of the adjacent channel spacing requirements could potentially aggravate the IBOC developers' already difficult task of achieving the proposed results without recourse to frequencies in other portions of the electromagnetic band and will likely create some degree of interference between the proposed LPFM signals and any new digital IBOC transmissions.

The premises on which the adoption of an LPFM service is based are flawed. One highly publicized objective of the LPFM is the expansion of service to urban markets. However, given the existing heavy utilization of frequencies in large urban markets, very few LPFM stations would be available in such markets even if interference standards were derogated. Where such stations could be situated, the resulting interference would almost certainly cause harm to existing stations, including those presently catering to urban minorities. Another suggested goal of the proposed

LPFM is to increase the number of minority and female owners who receive operating licenses. However, there can be no guarantee that new licenses could or would be awarded to minority or female applicants. Indeed, an unintended result could be the enfranchising of extremist anti-social groups in rural areas, where the opportunity for situating LPFM stations would be almost unlimited. One shudders at the prospect of adoption of a service which provides free public access to radical anti-social groups in remote outposts of the country who may promote hatred and violence and be virtually impossible to regulate or restrain.

The proposed LPFM service will result in excessive administrative and regulatory burdens on the FCC, which has limited resources. If the NPRM is implemented the FCC will face many herculean tasks, including (a) formulating rules for qualification and selection of applicants, (b) establishing standards for designating primary and secondary priorities between services and resolving conflicts between them, (c) setting standards for public service, access and accountability, and (d) providing for administration and enforcement of rules and standards applicable to a vast array of new facilities, which will create additional challenges and conflicts.

In conclusion, Entercom opposes adoption of the proposed LPFM service and strongly urges the FCC to withhold any action on the NPRM until the interference studies currently being undertaken by the NAB have been completed and evaluated and the unintended consequences of such a service have been fully explored.

Respectfully submitted,

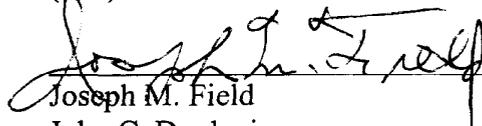
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Joseph M. Field

John C. Donlevie

Reed J. Slogoff

Date: June 4, 1999