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Office of the Secretary
Federal Communications Commission
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Ref: Low Power Radio Service
MM Docket No. 99-25
RM-9208
RM-9242

**Comments of
Mifflin County Broadcasting Company**

It is my opinion that low power FM service is not in the best interest of everyone concerned. It will cause interference of current facilities which I will explain in detail later in my comments.

Currently we have three AM stations and six FM stations serving a market of less than 55-thousand. Not to mention the public broadcast stations and religious stations on the air. Now we see the need for more low power FM stations.

For months we have been promoting a Public Service offering to community groups and organizations for us to use our expertise in marketing to help promote their special events. We have less than two or three taking us up on our offer. Aren't these the same community groups that would be applicants for low power service?

Those in the FCC branch really are out of touch with small market radio. As I look around our market you can see many properties that are for sale and the prices are real bargains. If anyone is really interested in getting into FM radio you can hardly miss these opportunities. I am of retirement age and frankly I find it difficult to find a buyer for my stations.

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Another more important issue is the In-Band system that was to be the salvation of radio. Believe me something has to be done to bring radio back to reality. I understand that companies developing this system are using the current standards. That appears to alter this system to a non-existent level.

I can see many ways the Commission could improve FM service, but not by creating new radio services for markets that are already declared as second class citizens by many retail and business groups. For the record we deal with clients every day that tell us there are too many radio stations to buy in such a small market.

For over a year I have been trying to move my Lewistown FM from 95.9 to 95.7 only to serve a small group of less than 3-thousand in Mifflintown a few miles from Lewistown. Co-channel and adjacent-channel FM interference was go great that our reception was a problem to those people. Under today's standards it is impossible to improve your facility. The engineering costs truly make this effort a contribution to service. In the eastern region you can't move an inch without causing a problem.

Let us look at the AM spectrum for a moment. I'm on 670 daytime protecting a dominate station in Chicago and therefore have no night time service. Our listeners really don't understand this explanation and simply want to listen to the special "one-of-a-kind" programming we offer at night. Shouldn't the commission revisit this instead of spending time on low power FM?

Again I say with this crowded FM band we don't need MORE....we need LESS and improve what we currently have. With over 40 years in broadcasting I've been through 80-90 and just see history repeating itself and I blame this docket for the current ownership consolidation.


Frank P. Froiani
President/GM