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

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
RADIO PACIFIC INC.

Most of the low power FM service licenses available will be in the small markets of America and the proposed "Low Power" will cover most small markets better than present AM station's in those markets, ours included. We have tried for forty years to shoe-horn an FM station into Port Angeles so we could cover our market, including Sequim just 10 miles down the road, with nighttime coverage. To this date, there has never been an FM frequency available in Port Angeles because of interference problems with not only US broadcasters, but Canadian broadcasters as well. Now the FCC proposes to give out low power FM licenses to anyone other than present day broadcasters and all of a sudden interference is not a problem.

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That's a real slap in the face for those of us who own AM daytime stations or any AM station owner in small markets with only 1000 watts of power. At night our signal only travels a couple miles because of all the nighttime interference. In addition, AM broadcasters are not allowed repeater stations to fill in the holes of our coverage area such as our FM counterparts because of interference problems. Again, apparently now there is no interference problem. We've been serving our community for 54 years and now the FCC proposes to give someone else a signal much better than ours.

What format will be broadcast on all these so called low power stations? We already have every conceivable format on the air now. What will be on many of these stations is the same thing being broadcast on pirate stations. Many of these stations will be broadcasting the type of programming that caters to listeners such as those young people who are committing the types of crimes that we saw in Colorado.

The current proposal as I understand it is to offer minorities opportunity to become broadcasters. I have no problem with the concept however if you look at the small markets of America, you will find few minorities living in small markets and most women are not getting into broadcast ownership because the financial reward is so little. Those of us who own and operate stations in small markets work long hours just to make a living at what we love to do. We are not getting bought up by big corporations however your proposal will only make it tougher to earn a living in this business.

Radio Pacific Incorporated is owned by a woman, Terry MacDonald, and she has made a living at being a small market broadcaster after 26 years in the same market working 60 hour work weeks.

This proposal will only set radio, atleast in the small markets, back to where we were in the 70's and 80's when most stations did not make a profit. You can only serve your community well if your financially strong.

This proposal will have little impact on the medium to big markets with their 50,000 watts AM and 100,000 watts FM. Think about what impact a 1000 watt FM signal in a small market with 1000 AM stations or 1000 watt AM daytime stations such as we own.

Sincerely,

 Jim MacDonald, Secretary
Radio Pacific Inc.