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In the Matter of  
Creation of a Low  
Power Radio Service

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

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In re MM-99-25  
RM-9208  
RM-9242

Comments of Cary H. Simpson

The proposal to add a Low Power Radio Service should be divided into three parts based on size of population. Most of the interest in LPFM has been shown in metropolitan areas, yet frequencies are scarce there. This is a totally separate set of circumstances from communities at the opposite end of the population level, where there is no scarcity of channels, and the proposal typically could result in six or seven separate LPFMs being assigned to small towns of 2,000. And, in between these two extremes, there are medium-sized markets where several LPFMs may fit.

This proposal affects each of the three sizes of markets in totally separate ways. In a city of two million, the addition of seven LPFMs could add new voices on the basis of one new voice per 285,000 persons. In a small town of 2,000, the addition of seven LPFMs could add new voices on the basis of one new voice per 285 persons. This could be catastrophic.

The proposals are so different that, in fairness, the LPFM question should be divided into three separate parts:

- Low Power FM for Metropolitan Areas
- Low Power FM for Medium Markets
- Low Power for Markets with population of less than 10,000

In this discussion, we will attempt to show the vast differences in potential effect of LPFM in large cities and medium markets and smallest markets. Much of the discussion will relate to how "Hometown Radio Stations" came into being in the smallest communities across America. These isolated towns are the places where the greatest number of LPFMs

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could be placed, yet to do so could greatly affect the existence of a group of several thousand small radio stations, which, for this discussion we term, "Hometown Radio Stations"

### **HOMETOWN RADIO STATIONS**

There is a fundamental question that should be decided by the members of the Federal Communications Commission before proceeding with the Creation of LPFM: Do the leaders of the Commission see any value in the thousands of "Hometown Radio Stations" that serve this nation? We define a Hometown as a place where everybody speaks when passing on the street, whether they know you or not. Hometown Radio Stations are endangered by the wholesale dropping in of numbers of LPFMs and this is an urgent appeal to look at the picture before repeating the short-sighted action of 80-90, which was designed to help one group, which it did not, but hurt other groups. The effects of LPFM on these markets could be large. Hopefully, these comments can help the Commission to understand the full impact of the proposals they are considering.

### **HOW HOMETOWN RADIO STATIONS CAME INTO BEING**

In the beginning, there were very few local hometown radio stations in communities of less than 10,000 population. As World War 2 was nearing its end, the FCC received hundreds of applications for AM new radio stations in towns having no "hometown radio station". (FM had not yet "happened" except in a few cities, and on an "old" set of frequencies in the 40 MHz band)

Up to the end of World War II, there had been only about 500 radio stations in the nation, and of these, only a handful were in small towns. But, the new idea caught hold; every town should have its own home town radio station. Just as each town had its own hometown newspaper, it made sense to have a hometown radio station.

During the next 15 years, the number of hometown radio stations was to grow

**exponentially. It seemed that every town from two or three thousand up wanted its own radio station. One radio station. That was enough. The radio station, like the hometown newspaper, the hometown department store, the hometown Rotary Club, the hometown high school, became an essential part of the fabric of each town across America.**

#### **ALLOCATIONS AFFIRM THE IDEA- AN FM FOR EACH AM**

**In 1962, when the Commission perceived that FM was growing in an uncontrolled way, a table of assignments or allocations was created. An orderly process was needed to stop the massive interference and inefficient use of channels that was occurring. Something had to be done. Mileage separations for FM assignments were created similar to ones on the television bands. The Table of Allocations for FM Stations came into being, and from that point until now, all assignments had to be done by Rule Making Process.**

**The Commission was careful to assure that each “hometown” where an AM station was located received a FM allocation. It seems logical that the intention of the Commission in 1962 was that the hometown radio station would be AM + FM.**

**Today, many “hometown stations” operate on both AM and FM, and in most cases, their FM is a music station and their AM works very hard to be active in the community, covering local news, sports, broadcasting religious program, and programming dealing with local issues.**

#### **SYMBIOTIC RELATIONSHIP**

**From the beginning of the Hometown Radio Stations in small American communities, there was a symbiotic relationship. The station served the needs of the community and the community supported the radio station. There was the clear expectation that the radio station would “be there” to cover local events, to broadcast local sports, to be part of the life of the community, its key staff members were part of the community’s leadership, and the community relied on “the radio station” to be at the center of its progress.**

**And, the other side of this was the expectation by the radio station that the community's businesses, industries and other groups would buy advertising on the station and would spend money to support the costly programming such as local news, local sports, local events, etc. It worked effectively.**

**However, in the 80s, there would be an unexpected change to the longstanding "balance" of nature. It was Docket 80-90.**

### **A BAD IDEA**

**Everyone seems to agree today that 80-90 was a bad idea. It was conceived to benefit minorities in large metropolitan areas, who had been unable to achieve ownership in radio. Benefits of 80-90 were vastly oversold using "box-car numbers" that "thousands of new stations could be created" but they did not say where these stations would have to be put.**

**Docket 80-90 eliminated longstanding contour protection to "Big Power" Class C and Class B stations that previously had extended out 150 miles. The new belt between 101 miles and 150 miles away from each big power station was opened up for new assignments.**

**But, the proponents of 80-90 did not mention the fact that most of the big power stations were located in cities, so the new stations would have to be far from the cities. Stations in any area must be assigned at least 800 KHz apart on the dial. Examination of almost any city's listing of FM channels shows stations assigned each 800 KHz up the band (92.3, 93.1, 93.9, 94.7, etc.) either in the city proper, or within a short distance. City FM dials were filled up.**

### **NO MORE STATIONS IN CITIES; A CRUEL HOAX**

**When the Commission released its table of assignments to be added through Docket 80-90, I believe that only two cities of any size received 80-90 allocations, Louisville, KY and Atlantic City, NJ. All of the other allocations made possible were "out in the boonies".**

**The scarcity of "new" channels in metro areas became apparent when eager minority**