

JUN 3 0 1999

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KEY
BROADCASTING
INC.

1 July 1999

Federal Communications Commissions
1919 M. Street
Room 222, NW
Washington, DC 20554

ORIGINAL

RE: MM Docket 99-25

Dear Chairman Kennard and Members of the Commission:

This letter is written in opposition to the proposed rulemaking for allowing low power FM (LPFM) radio service.

The idea in the proposal that it would benefit minorities is not very well thought through. My understanding is that the LPFMs would almost exclusively be located in small communities, which have modest concentrations of minority populations. Yet, major markets with higher amounts and concentrations of minorities would not be affected due to the fact that there is a higher concentration of signals in such areas. Multiple LPFM's would not be allowed in these areas since there would not be enough room in the FM band.

As a small market broadcaster myself, I pride myself on the fact that we make every reasonable effort to provide airtime to representative members of any and all groups in our local population.

Additionally, there is no question that there will be interference, restricting the lawful (licensed) broadcasters' signals. How will our rights to our frequency be protected if the proposed rule is allowed to become effective? The bottom line is they will not be.

We oppose the proposal because, in the end, the listening public will not be well served by the changes, and ultimately will have bad radio service.

Respectfully Submitted,


Don Salmon
Program Director
WAIN

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