

**Before the
Federal Communications Commission
Washington DC 20554**

In the Matter of:)	MM Docket No. 99-25
)	
Creation of a Low)	RM-9208
Power Radio Service)	RM-9242
)	

Comments of L A Radio, Incorporated
Licensee of KSOB(FM)
Dell Rapids, South Dakota

To the Commission:

1. The Federal Communications Commission [“FCC”] seeks comments on its proposed implementation of a new Low Power Radio Service [“LPFM”]. Comments on this proposed service are due August 2, 1999 with reply comments due on September 1, 1999.

2. L A Radio, Incorporated [“L A Radio”], licensee of KSOB(FM), Dell Rapids, South Dakota, wishes to file its COMMENTS in OPPOSITION to the LPFM proposal through this filing.

3. In its LPFM Notice of Proposed Rule Making, the FCC seeks to expand broadcasting and community service opportunities to those individuals unable to compete in the current regulatory environment. L A Radio takes issue with this position. L A Radio believes the underlying premise used by the FCC to justify implementation of LPFM would actually harm existing broadcasters along with the current radio audience, and destroy the integrity of a regulatory system which has, by and large, worked well to date.

4. FCC Chairman Kennard has stated that “we are standing at the threshold of ... a century that promises to be as revolutionary in the technology that affects our daily lives and the future of our country as the inventions that so profoundly shaped the past 100 years.” Kennard goes on to state a cautionary note, however, in that “we also must ensure that as competition accelerates that consumers get the information that they need to make informed decisions...”

5. L A Radio believes Kennard’s vision will be crippled with the implementation of LPFM as proposed. Among the many concerns, industry professionals have a problem with the proposed relaxation of second and third adjacent channel requirements. As an example,

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L A Radio's KSOB(FM) broadcasts at 95.7 MHz as a Class C3 facility. Radioworks, Incorporated's KGLI(FM) broadcasts with 100,000 watts at 95.5 MHz less than 100 miles to the south. Existing broadcasters are already tightly spaced under current adjacency restrictions.

We are in complete agreement with the National Association of Broadcasters ["NAB"] position that any "proposal to add as many as 4,000 low-power stations to an already-congested radio band threatens the transition to IBOC digital radio, will likely cause devastating interference to existing broadcasters, and will challenge the FCC as guardian of the spectrum."

6. With this potentially devastating interference, L A Radio believes the FCC should be extremely concerned with public service issues such as the new EAS technology. Is it conceivable that in its rush to provide small microradio "islands" that the FCC might instead be fostering the creation of thousands of additional interference pockets? Might these pockets of interference prevent thousands of listeners from hearing timely emergency information? If this occurs just once -- if one life is lost in an emergency situation because of interference to an existing station from a microbroadcaster -- have we successfully implemented Kennard's goal to "ensure that as competition accelerates that consumers get the information they need?"

7. With nearly 12,500 radio stations in service across the United States of America, the Dell Rapids/Sioux Falls, South Dakota market is served by more than seventeen (17) stations. These stations in southeast South Dakota provide a wide array of local news, public service and entertainment programming. In emergency situations, these same stations drop everything they are doing to transmit critical information to listeners -- each and every station. Will LPFM stations be required to do the same? Will LPFM stations participate in the EAS system? Can the FCC guarantee no interference to existing facilities "doing the job right" from proposed facilities which seem to be no more than "hobby" stations?

8. The controversy surrounding LPFM should not be one of economics. In any real world situation, the best product typically wins. L A Radio would dispute any assertion from LPFM proponents that the broadcast industry is opposed to the proposed service based on economics.

LPFM is generally opposed by the broadcast industry because it appears that in its zeal to establish a purely redundant service, the FCC hasn't fully researched the potentially disastrous aftermath of permanently ruining a band of radio frequencies set aside to serve the public. The very public the FCC proposes serving with LPFM will, in fact, become the losers in the process.

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9. Local broadcasters all across the United States contributed nearly \$7 billion worth of community service in the past year. This fact, documented by Public Opinion Strategies of Alexandria, VA, underscores the importance broadcasters place on genuine service to our listening public.

10. Local broadcasters, such as KSOB(FM), have contributed greatly to the quality of life in their communities of service. Beyond that, local broadcasters have protected their audiences from weather and civil disasters. Local broadcasters have informed them through regular news, information and public service programming. Local broadcasters have for years been in the middle of school sporting events, community fundraisers and diligently working with civic organizations to improve the local and regional quality of life. Local broadcasters have been doing exactly what the FCC has expected of us – and in most instances, much, much more.

11. To allow the FCC to implement a service which would wreak technical havoc on a group of very dedicated professionals is, very simply, wrong and misguided. L A Radio opposes the implementation of a redundant and technically inferior broadcast service.

Respectfully submitted,

(s)

Lee O Axdahl, President
L A Radio, Incorporated

July 26, 1999