



Broadcasting Services of KEA Radio, Inc.

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July 19, 1999

Re: MM Docket 99-25

RM-9208
RM-9242

Secretary,
Federal Communications Commission
Washington, D.C. 20554

Dear Secretary:

Enclosed please find the original and twelve copies of KEA Radio, Inc.'s comments on the above captioned docket and associated rule making. Should there be questions regarding this filing, please do not hesitate to call.

Sincerely,

Ronald H. Lavengood
President and General Manager

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The implementation of Low Power FM could very well have an adverse effect on the development of In-Band, On-Channel digital radio. Local broadcasters have looked forward to this new technology in that it will be a great help in serving our communities.

We would also point out that the Low Power FM proposal will not achieve the goal of serving urban neighborhoods since very few stations would be available in the urban communities. Most of the available stations under the proposal would be in small towns and communities such as ours.

In the 1980s, the FCC began a proceeding that ultimately ended with thousands of new stations being added to the band. The result of the Docket 80-90 was that there were too many stations in the marketplace. Docket 80-90 was the direct cause of consolidation. The Commission should learn from this mistake and not repeat it with the implementation of Low Power FM.

The Federal Communications Commission is already underfunded and deals with a deluge of administrative paperwork. The adoption of the Low Power FM proposal would create a greatly increased regulatory and enforcement burden on the Commission and its staff.

In summary, we would point out that the implementation of the Low Power FM proposal will be the end of service to the local communities of this nation. We would urge the Commission to consider the small town local broadcasters who are doing a good job of serving their communities with news, public affairs programming, sports, weather coverage and entertainment. Please do not put an end to this necessary service by implementing Low Power FM.

July 19, 1999

Respectfully Submitted,

KEA Radio, Inc.


Ronald H. Livengood
President