

Dear Commissioners & Staff,

BACKGROUND: I am a second-generation radio broadcaster with 30 years of experience who consults stations, owns stations and publishes the Small Market Radio Newsletter.

OPINION: I am concerned that Low Power FM may not be the best solution to the problem it is designed to address:

It will cause interference to existing stations according to the interference protection standards now in place. With the proliferation of "regular" stations, alteration of the standards would be necessary to shoehorn new LPFM stations onto the band.

The objective of providing outlets for minority and community groups is laudable, but LPFM will not achieve that end. First, those markets where such outlets are sorely needed - larger urban areas - don't have the band space to accommodate the new channels. Second, there is far more demand for the service than can be accommodated under any circumstances ... so this solution will be "too little" by a long shot.

In addition, history shows us that laudable goals are often subverted over time. Take the Docket 80-90 proceeding, which created a glut of stations and undermined the economic strength of the industry as a whole. Once a new Pandora's box is opened with LPFM, it will be difficult to control the outcome.

In keeping with my last point, administration of these new stations will be an administrative nightmare for the Commission. If the spirit of the ruling carries through, you will be dealing with a massive number of entities who are not accustomed to the processes of filing for and maintaining radio licenses.

Some years ago the FCC stopped granting 10-watt stations because, in its view, the spectrum would be used more efficiently by stations with greater power and the ability to reach more people. In this day of overcrowded spectrum, this view is more valid than ever.

The LPFM proceeding intends to use a mature technology for a new and groundbreaking purpose, and there exist today another medium far more suitable to the task - the Internet. With the rise of "webcasting," it is both practical and economical for an entity to bring its message to the public using this medium, where the opportunities are practically unlimited, and bandwidth and interference are moot points. Even if the user base is not completely there today, by the time LPFM stations actually were to reach the air - after much record-keeping for the Commission and expense for the applicants - the Internet will definitely be a mass medium.

SUMMARY: I urge you not to adopt LPFM. It will create more headaches for the Commission and for the radio industry than it will create benefits for the intended users. The explosion of illegal broadcasting activity has little to do with whether this is the best medium for legitimate community entities. The Internet provides a convenient, natural outlet for these entities; it accomplishes the goal of LPFM without the FCC having to burden itself with regulatory overhead and without the danger of harming the many hard-working, community-service-oriented commercial broadcasters.

Thank you for your attention to these comments.

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