

Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

In the Matter of

MM Docket No. 99-25

Creation of a Low
Power Radio Service

RM-9208
RM-9242

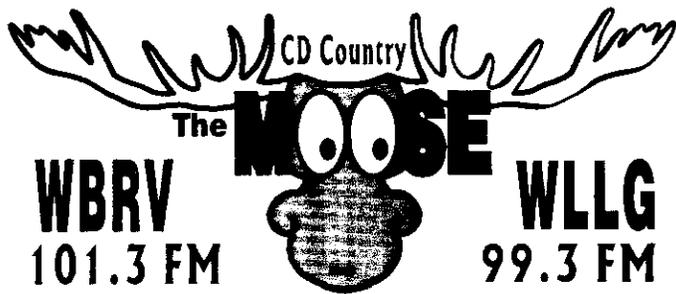
Comments of

William R. Flack
 The Flack Broadcasting Group L.L.C.
 WBRV AM-FM, Boonville, NY
 WLLG FM, Lowville, NY

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The Flack Broadcasting Group, LLC



Dear Commissioners:

I am writing this formal comment to express my concerns regarding the proposed Low Power FM ruling. My wife and I purchased WBRV AM-FM in Boonville, NY and WLLG-FM in Lowville, NY in September, 1998. We purchased these small town stations because I have worked in the chaos of consolidation for many years and decided that it's time to go out on my own. I have 20 plus years in the radio business and I regret the many changes made in this industry. We have chosen to run as small town local stations. We have been able to keep the stations live throughout most of the day. I am fortunate enough to have a morning D.J. who is loved by the community and has worked for the stations for 35 years. These stations are the ONLY daily source of local news in the area and we have one full time news person on staff.

The stations are simulcast. We must simulcast in order to cover the entire area. The towns of license are only 23 miles apart, but the 3,000 watt and 6,000 watt FM signals do not overlap. Our primary coverage area is Lewis County, NY (population 27,000) and Northern Oneida and Northern Herkimer Counties, also in NY (an additional 20,000 population). Lewis County has the lowest per capita income in New York State and the second highest unemployment in the state (10-14 percent). The major industry is agriculture.

Our stations are licensed to serve the communities and we take that commitment very seriously. The stations are involved in just about every community event in the area. We air daily news features dealing

The Flack Broadcasting Group, LLC

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with issues affecting the residents of our communities. From the price of milk, to the lack of well paying jobs, to environmental and senior citizen issues. In addition, we air community events twice per hour. We air the obituaries, birthdays, anniversaries, road and school closings, school lunch menus, local high school sports and live church services on Sunday mornings. Our weather and storm coverage is unsurpassed in the area. The county government officials in Lewis County look to our stations to disseminate public information and we have an excellent working relationship with the Sheriff's Office and the Office of Emergency Management. In my opinion, we are what radio stations are supposed to be..a major force in the community, and my wife and I are proud of that.

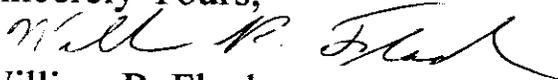
I understand that the commission is not interested in details other than signal interference, but I think it's important that you know how, in my opinion, the LPFM ruling can adversely affect the ability of radio stations like ours to serve the community. We are a small, poor, rural community. The economic expansion of the late 90's has bypassed this area. The advertising pie is not growing, in fact, it is shrinking. If the commission were to allow additional commercial stations in this area, with relaxed regulations, someone could literally start a radio station with less than 25 percent of the investment that we made in these stations just a year ago, buy a computer and put a satellite fed format on their 1,000 watt station or series of 10 or 100 watt stations throughout the area, then siphon advertising dollars without adding additional jobs or serving the community. My wife and I have invested everything we own into this radio station, including our home . If our advertising revenues are hurt, we will not only be hurt personally, but we will not be able to continue providing the services that we now provide. That would be a tragedy for the community.

Ladies and Gentleman, my wife and I did not purchase these stations to get rich. We purchased the stations because we enjoy radio and love the community in which we live. We're a small mom and pop company with

10 employees serving a listening audience potential of under **50,000** people. I manage the sales effort and programming and my wife is the business and office manager. We both work 50-60 hours each week while raising 4 children. We are not mega group owners that own stations throughout the country. I seriously believe that the L.P.F. M. ruling is a major threat to a business like ours, not the mega owner. I am not against a church, school or community organization getting a license to start a low power radio station, I am against the opening of commercial FM licenses without the regulations that I must adhere to. I suggest that any new Low power stations be classified as noncommercial. Non commercial stations would enable diverse groups to deliver their message and provide a unique service to the communities and not hurt current license owners.

I thank you for the opportunity to comment on this issue and I hope you will consider my concerns when making your decisions.

Sincerely Yours,



William R. Flack

President

c.c. Congressman Sherwood Boehlert
Congressman John McHugh