

I have been in the radio broadcasting industry since 1971, beginning as a sales manager for a major broadcasting company in Minneapolis/St. Paul, Minnesota. In 1988 I began my own broadcasting company, Omni Broadcasting and started searching for radio stations in Minnesota and the Midwest to buy. Since 1988 I have purchased and/or built four 100,000 watt FM=92s, one 25,000 watt FM, and a 1,000 watt AM.

I am a "hands-on" owner/operator, working 12-15 hour days to run a profitable radio company. We employ over 60 people company-wide.

I have major market experience (the Twin Cities, Chicago, St. Louis, Denver, Detroit, New York, Washington DC, Sacramento, Honolulu, San Antonio, Las Vegas, San Jose) and now small markets in rural Minnesota (Brainerd, Bemidji and Alexandria).

With the abundance of radio signals in most markets in America today, I do not feel we need or want low power FM=92s to drive even more operators out of business.

My reasons for opposing low power FM=92s are many:

1) LOW POWER FM WILL CAUSE INTERFERENCE TO EXISTING STATIONS.

Because the FCC would have to alter its existing interference protection standards, it would result in even more interference to existing signals,

and thus a loss of service to listeners.

2) LOW POWER WILL NOT ACHIEVE WHAT THE FCC WANTS. If the FCC eliminates

second and third adjacent channel protections, very few stations would be

available in the urban markets. Serving urban communities and neighborhoods is a stated goal of the FCC in allowing low power FM.

Under this proposal, or any proposal, there would not be enough spectrum for those who are interested in a low power FM. How would the FCC handle

the requests?

3) LOW POWER FM WILL NOT CREATE VIABLE STATIONS TO INCREASE FEMALE AND MINORITY OWNERSHIP. How do you guarantee that minority and female owners

will apply and then actually receive a license? And, the economic viability and stability of low power stations is questionable.

4) LOW POWER FM WILL ONCE AGAIN CREATE THOUSANDS OF NEW STATIONS similar

to the 1980-92s when the FCC created the "80-90 Docket". That allowed to=

o many stations in markets, ensuring that many would not succeed because there simply was not enough revenue to support all of these added stations. Obviously this forced the FCC to loosen ownership rules and has now resulted in mega-broadcasting companies. The Commission should not travel down this road again. One huge mistake was made then, let=92s not compound it and make it worse.

5) LOW POWER FM CAN ONLY BE AN ADMINISTRATIVE NIGHTMARE TO THE FCC.

With limited resources, how can the Commission provide assistance to LPFM

applicants as it proposes, when assistance has never been given to full-power stations. There would also be the increased regulatory and enforcement burden not only for the newly-licensed LPFM stations, but also for all of the unlicensed "pirate" radio stations that refuse or are

unable to obtain licenses and continue to broadcast. The Commission is proposing to place amateur stations in the middle of a mature service.

6) LOW POWER FM PROPOSALS FOR 1-10 WATT STATIONS ARE AN INEFFICIENT USE OF THE SPECTRUM. The Commission altered its rules in 1978 to prohibit further licensing of 10 watt "Class D" noncommercial educational stations

because it determined the spectrum could be used more efficiently by larger stations that can reach more people. The same remains true today.

7) LOW POWER FM WILL HARM THE DEVELOPMENT OF IN-BAND, ON-CHANNEL (IBOC) DIGITAL RADIO. The proponents IBOC digital radio have been developing their systems based on the current interference protection standards. The systems utilize "sidebands" of the analog signal to transmit the digital signal without the need for additional spectrum. Any alteration to the second-adjacent channel spacing restrictions could harm radio broadcasters in their transition to digital.

I want to be emphatic on how much of a danger Low Power FM will be to existing radio signals. The interference problems they will cause will cost broadcasters thousands and thousands of dollars to try to correct a damaged signal. We can anticipate no cooperation by the LPFM operators to correct their signal and if we want to maintain a quality signal so our listeners can hear us as they are accustomed, we full-power operators

will be forced to spend money that we don't have. Does the Commission really want to drive more of us out of business?

Is the Commission's goal to have only mega-broadcast companies and LPFM

operators (who cannot provide quality programming because of lack of money and experience,) and eliminate those of us who have devoted ourselves to the broadcasting industry and enjoy serving our local communities?

I should point out that all of our stations devote hours and hours of air-time to local news, local information, local sports and local programming. We run on the average 12,000 public service announcements a year, produce local public affairs programs that run in prime time, Monday through Friday, have won awards both on a statewide (from the Minnesota Broadcasters Association, Minnesota News Network) and national

basis (a three time NAB "Crystal Award Winner"; "Service to America Radio

Partner Winner").

We take our commitment seriously to local programming and to serving our communities. Lower power FM=92s will force our attention away from what we

do best, and make us act as police of the airwaves, protecting our signals so our listeners can enjoy our programming, news and information.

Please DO NOT allow low power FM=92s - it will destroy Full-Power broadcasting and the industry I love.

Louis H. Buron, Jr.

President/Owner

Omni Broadcasting Company

KBHP-FM, KKZY-FM, KBUN-AM, Bemidji, MN

KIKV-FM, Alexandria, MN

WJJY-FM, Brainerd, MN

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