

I have been in the radio broadcasting industry since 1974. I began as an account executive in the sales department for a Twin Cities (MN) radio station and left 12 years later as the station manager. For the next 8 years I worked as a station manager for two different companies in Minneapolis/St. Paul. In 1994 I became a part of rural Minnesota's broadcast community and have loved every minute of it. The challenges we face in radio are the same in rural America as in urban areas.

I am now a co-owner of two stations located in the Brainerd Lakes area of North Central Minnesota: WJJY, a 100,000 watt FM and KTCF, a 25,000 watt FM.

I oppose low power FM's for the following reasons:

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 process 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's when the FCC created the "80-90 Docket".

That allowed too 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. The Commission should not travel down this road again. One huge mistake was made then, let's 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.

7) LOW POWER FM WILL HARM THE DEVELOPMENT OF IN-BAND, ON-CHANNEL (IBOC) DIGITAL RADIO. The proponents of 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. 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?

I want to mention that our stations (we have a staff of over 25 people) are committed to the communities we serve. We are considered a resource by the community because of that commitment. We involve ourselves in many worthwhile events and fund-raisers. Last year alone we raised over \$36,000 to end child abuse in our area, and received an award from the NAB's Educational Foundation ("Service to America Radio Partnership Award"). Our staff volunteers their time and talents in many organizations and believes in giving back to their community. We are proud to be broadcasters in rural America and believe our integrity will be at risk if we must focus our efforts and money on engineering difficulties and signal interference instead of providing quality local and community service programming to our listeners.

DO NOT ALLOW LOW POWER FM'S to destroy the radio broadcasting industry that has been a major part of my life for so long.

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