

Further, in recent years the Commission has been downsizing and trying to make do with less government resources in carrying out its core functions. In some respects, the Commission is having budget and personnel difficulties in carrying out the programs it presently has in place. Several years ago the Commission asked the Broadcast Executive Directors Association on a state-by-state basis to administer an alternate inspection program to help the FCC obtain broadcast station compliance with its rules. The program has been successful. But with the FCC having to rely more and more on broadcasters and broadcaster associations to help the agency out with its enforcement functions, it is unthinkable that the FCC wishes to add the regulation of thousands of new radio stations to its responsibilities. Unfortunately, the Commission most likely will not be able to regulate these new stations and the result will be chaos on the FM band just as now exists on the Citizens Band radio band.

Many years ago the Commission opened up the AM radio band to increased numbers of radio stations. The result was substantially increased interference and the diminished enjoyment of AM radio listening by the public. Recently, the Commission has attempted to remedy this interference by opening up the AM expanded band and moving stations off of the AM standard band. The Commission should not make the same mistake with the FM band that it made with the AM band. Increased interference does not

serve the public and is not in the public interest. Low power FM radio as proposed by the Commission should not be adopted.

If the Commission truly believes that it is in the public interest to increase the number of voices in a marketplace by awarding hundreds or thousands of new low power station broadcast station authorizations, the Commission should consider the allocation of new spectrum for the new low power service. This would accomplish the Commission's goal of increasing the number of broadcast voices, and would not have the harmful effect of causing interference to existing broadcasters.

Respectfully Submitted,

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