

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	MM Docket No. 99-25
Creation of a Low	)	
Power Radio Service	)	RM-9208
	)	RM-9242

**To: The Commission**

**COMMENTS OF DE LA HUNT BROADCASTING**

De La Hunt Broadcasting (A De La Hunt), by its attorney, hereby submits its comments on the Commission's proposal to establish a low-power FM service. With respect thereto, the following is stated:

De La Hunt is the licensee of Stations KDKK(FM) and KPRM(AM), Park Rapids, Minnesota. Its President, Ed De La Hunt, is an established broadcaster with 37 years of ownership experience. As such, De La Hunt Broadcasting brings a wealth of practical experience in submitting these Comments.

The goal of the LPFM proposal is to offer opportunities for under represented individuals and groups to enter the business of offering community-oriented audio service to the public. Despite this laudatory goal, De La Hunt believes that a new LPFM service would cause serious harm to existing FM radio service. Putting aside the fact that an LPFM service will dilute the economic base underlying radio service in markets, from a much more basic, public interest, standpoint, De La Hunt believes that LPFM service will cause substantial harm to signal quality.

As it stands right now, most FM radio stations are protected only by the minimum spacing rules. While in many instances, adherence to minimum spacing requirements protect the 1 mV/m service area of FM broadcast stations, the spacing rules only are an *estimate* of actual

interference. Many stations already receive interference within their protected contours from other fully-spaced stations. Despite this, fully spaced FM radio stations are not protected apart from the protections afforded under the minimum spacing rules, regardless of the amount of actual interference that is received. 47 C.F.R. § 73.209.

Therefore, the spacing rules already represent only a quick and dirty gauge of interference. Weather conditions can affect station protection. One recent experience is instructive. One station owner associated with De La Hunt recently was involved in the construction of a new station. Recent high temperatures created temperature inversions, such that the station could not even be received within its normal predicted service area.

In reality, FM stations face a great deal of interference to their proposed service areas already, and LPFM service will create an even greater source of likely interference. In many respects, the FM band already is over congested, and the adoption of the LPFM will make it even more congested. Just as the AM band gradually became less effective as a means of providing quality broadcasting due to excessive attempts to make an over-expansive use of the available spectrum, which later resulted in the FCC having to take aggressive steps in the mid-1980's to attempt to resurrect the quality of that spectrum, the FCC proposal, if adopted, will run a significant risk of causing similar injury to the FM band by creating more clutter, more objectionable interference, and a less desirable medium.

This is especially true in light of the Commission's proposed elimination of second and third adjacency protection standards. While the Commission proposes to eliminate second and third adjacency protection standards, De La Hunt strongly believes that those protection standards

must be maintained. While the NPRM indicates that a contour overlap methodology is resource intensive, the Commission owes it to the integrity of the existing FM broadcast medium to ensure that existing broadcasters are not harmed.

Alternatives exist already for entities wishing to provide a locally based broadcast service. The Internet now exists as a means for additional radio voices to be heard, which will not harm the existing radio band. Local radio service also theoretically can be provided on local cable systems, which also would not harm the existing FM radio band.

**WHEREFORE**, it is respectfully requested that these Comments be considered in conjunction with the matter being reviewed in this proceeding.

Respectfully requested,

**DE LA HUNT BROADCASTING**

By: \_\_\_\_\_  
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August 2, 1999