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FCC 99-25

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July 21, 1999

Office of the Secretary  
 Federal Communications Commission  
 445 Twelfth Street, S. W.  
 Washington, DC 20544

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JUL 27 1999

FEDERAL COMMUNICATIONS COMMISSION  
 OFFICE OF THE SECRETARY

Reference: MM Docket No. 99-25

Dear Sir or Madam:

This letter is to inform you of my strong opposition to any effort to add additional frequencies to the airwaves, in general and specifically in the Bryan-College Station Market, for the concept of "Low Power FM" broadcasting. My opposition is based on the following reasons:

1. Low Power FM will cause interference for existing stations. In order to establish a low power service, the FCC would have to drastically alter its existing interference protection standards, which are in place to maintain the integrity of the spectrum. Elimination or alteration of the standards will result in increased interference to existing signals and a loss of service to listeners.

2. Low Power FM will harm the development of In-Band, On-Channel (IBOC) digital radio. The developers of IBOC have based their systems on current interference protection standards. (continued on the next page)

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The systems use the “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 impede the transition to digital.

3. Low Power FM will not achieve what the Commission wants. Even if the Commission eliminates second and third adjacent channel protections, very few stations would be available in urban markets. Serving urban communities and neighborhoods is a stated goal of the Commission in establishing this service. It is counter-productive to spend the resources to establish an entirely new service that ultimately will be unable to serve the listeners for which it was intended. A majority of LPFM frequencies will be allocated to medium and small markets, which already provide diversity of programming, diversity of ownership, and strong support for community based charities and service organizations. Further, stations in small markets are most vulnerable to the decreased economic viability resulting from the increased fragmentation of their audience. This decrease in viability will reduce the ability of small market stations to maintain their current levels of contribution of time and resources to the communities they serve.

4. Low Power FM will not create viable stations to increase minority and female ownership. Even if frequencies are available in a particular area, there is no guarantee that minority and female owners will want or receive a license- whether they are allocated on a first come-first serve basis or through an auction. Furthermore, the economic viability of low power stations is doubtful.

5. The Commission has traveled down this road before. In the 1980's the Commission revised its rules in what is known as “Docket 80-90.” This allowed

thousands of new stations on the air. The culmination of this revision was the lifting of national ownership restrictions in the Telecom Act of 1996. The consolidation was inevitable because of the economic pressure placed on radio to exist and remain viable. Roy Stewart, Chief of the Mass Media Bureau, called "Docket 80-90" the biggest mistake the FCC ever made. Why repeat it?

6. Low Power FM will be an administrative nightmare for the FCC. The Commission has limited resources. The notice proposes to provide assistance to LPFM applicants, assistance unlike any ever provided to full-power applicants. Additionally, there is the increased regulatory burden of overseeing frequencies offered to persons with NO broadcast ownership experience and NO knowledge of how to properly construct and operate a broadcast station.

7. It appears that the proposed ownership limits for LPFM stations, and the Commission's desire to license a favored group, cannot be reconciled with the Telecommunications Act of 1996 or the Balanced Budget Act of 1997.

It is for all the above stated reasons that I strongly urge the Federal Communications Commission to halt any further action on Low Power FM.

Sincerely,

A handwritten signature in black ink, appearing to read "H. S. Holliday". The signature is fluid and cursive, with a long horizontal flourish at the end.

H. S. Holliday  
General Manager KKYS-FM & KAGG-FM Radio Stations

Cc: John Borders