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July 26, 1999

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
The Portals  
445 12th St. SW  
Washington, DC 20554

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FCC MAIL ROOM

RE: Comments on the Proposal for Low Power FM Radio  
MM Docket # 99-25

Dear Ms. Salas, FCC Commissioners & Staff:

Overview: The existing FCC technical rules permit additional applicants to build new FM Radio stations in many locations of the United States, as either an educational non-commercial FM, or a commercial FM. Changes in the FCC's current technical FM rules are not necessary, and should not be changed. These changes would permit further degrading of broadcast services which citizens of the United States now enjoy.

It's imperative for the good of the public, and for the FCC to be pro-active in maximizing the number of FM facilities allowed within the existing technical rules. By keeping the current rules in tact, we will maintain the technical integrity of the system and grant opportunity for new applicants.

Back ground on the filer: I have been a small market Mid-west Radio broadcaster for over 40 years, and have been involved in FM stations for 25 years. Beginning with a low power AM in 1972, we built our company to 16 stations. Including new FM's built with construction permits in 4 small markets. Today, as I write these comments....there are still opportunities to apply for and build new FM Radio stations in the markets we serve. All under the existing rules!!

How could we open up the broadcasting industry to more operators/players? The existing non-commercial FM rules permit non-profit organizations....churches, colleges, special interest groups....to own and operate non-commercial stations. The FCC could accommodate new applicants in cities of all sizes across the nation. No auctions are required, and these non-profit special interest groups could be easily accommodated.

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Does this make sense? The above step offering non-commercial access to the FM band would meet all of the FCC's objectives of the low power FM Radio proposal. Churches, special interests, neighborhood minority groups and ethnic groups would be offered space for FM facilities on the non-commercial band. And this insures the technical integrity of the commercial FM spectrum and it's service to the United States....and leaves us positioned to accept "in band/on channel" digital improvements as they come in the future.

Further thoughts: As an operating commercial broadcasters, I continue to support the following 5 points.

- 1) Any US citizen should have the right to apply for and receive an FM license, as long as they abide by the current existing technical rules.
- 2) Non-commercial FM bands provide for the exact purposes set forth by the low power FM Radio proposal.
- 3) The non-commercial stations should be specifically that....non-commercial. I would hope the FCC is prepared to enforce this.
- 4) The current commercial broadcasting industry and the FCC should "hand in hand," encourage and support digital (IBOC) broadcasting....and there should be no technical changes to the present rules that could hinder or slow up this service.
- 5) Non-commercial FM stations are currently permitted to build translators without regard to their local coverage area. A non-commercial FM in Minnesota can build a translator in Idaho, and feed it by satellite. This should not be permitted for any new non-commercial stations.

Up to this point, we've talked about new services, and have not targeted the negative impact of the proposed low power FM Radio proceeding.

Interference: The changes proposed in the FM low power proposal would create interference in many areas throughout the country. Local and regional Radio reception could be destroyed, and the public could be facing on the FM band in the coming years, what has already happened in the last quarter century to the AM band. The broadcasting industry and the FCC should have learned from their AM experience....not to let it be repeated with the FM band.

Lessons learned from 80-90: In the 1980's...early 1990's, the FCC established and implemented the 80-90 ruling. Hundreds of new FM Radio stations were established. Some of those operators failed in the economics of the industry and community services were damaged, thus requiring the FCC to re-evaluate their rules and to allow further consolidation which is underway as we speak. If we allow commercial low power FM stations....we're opening the door for a repeat performance.

Community service and local news: The sixteen Radio stations our Company operates, are all stations which have committed themselves primarily to their communities. In each market, there is a full-time news department. That means someone on the staff gets up every morning without an operating control room board shift, without a sales list, without a front office to watch....they are 100% focused on developing and presenting local news. These Radio stations have been recognized nationally by the National Association of Broadcasters (we have 3 Crystal Awards for outstanding community service in the past 5 years)...and continue to focus on what their community needs. This is made possible by a robust and profitable business environment. Adding additional low power FM stations in these markets, will not destroy our Radio stations, but there is a strong possibility it would hinder the ability to have the staffing and resources necessary to serve these communities in the future.

Thank you for allowing me the opportunity to present these comments. If you have any questions, please call.

Respectfully submitted,

A handwritten signature in black ink that reads "Dean Sorenson". The signature is written in a cursive, flowing style.

Dean Sorenson, President