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WFHR AM 1320

103.3 WGLX Classic Rock

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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

Comments of

Wisconsin Rapids Broadcasting, LLC
d/b/a WFHR/WGLX Radio

by Miles G. Knuteson
Vice President and General Manger

July 16, 1999

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Dear FCC Commissioners and Staff:

I am writing in opposition to the establishment of a Low Power Radio Service. I do this for a number of reasons.

- **Low power FM will cause interference to existing stations.** The FCC admits that to establish the proposed low power FM radio stations, existing interference protection standards would have to be lowered. The reason these standards were originally put in place was to protect the integrity of the spectrum. Changing these standards will result in increased interference to existing broadcaster's signals. This would mean a loss of service to listeners.
- **There are existing frequencies still available on both the non-commercial and commercial bands.** Those parties interested in establishing additional radio stations should apply for those frequencies that are available.
- **Low Power FM will harm the development of IBOC digital radio.** Any alteration to the second-adjacent channel spacing restrictions could harm radio broadcasters in their transition to digital.
- **Low Power FM will not achieve one of the main purposes for which it is attended.** One of the goals of the Commission is to allow more minorities to own and operate radio stations. However, very few LPFM frequencies would be available in urban areas. The majority of frequencies available would be in the smaller markets where existing broadcasters are already under extreme economic pressure from new stations created from Docket 80-90.

- **We should all learn from history.** In the 1980's, many new FM radio stations were created with Docket 80-90. As a result, many more FM radio stations were created. Since there are only so many advertising dollars to go around in any radio market, the new stations meant that in many cases, service to the community did not increase but rather decreased. Docket 80-90 created many "juke box" radio stations that were either programmed via satellite or through automation. Many radio stations that took pride in serving their community could no longer afford the level of service that they had in the past. For example, at one time WFHR/WGLX employed a combination of FIVE full and part-time newspeople. We now have two. At one time, radio stations were "live" 24 hours a day. Now, many of the stations in our Central Wisconsin market must use satellite programming or automation to remain economically viable. In addition, such community services such as broadcasting high school sports is becoming a thing of the past as economics will just not allow it. Therefore, the establishment of more radio stations may actually DECREASE service to a community. The Commission should consider QUALITY of existing radio service as important as the QUANTITY of the service.
- **How will LPFM be administered?** The Commission has limited resources. Pirate radio stations are still a problem. The addition of hundreds of radio stations will certainly create interference problems with existing broadcasters. This will will cause a hardship to stations that have their signals impaired and cannot get adequate assistance from the Commission to solve the problem.
- **LPFM would reward pirates.** The FCC is proposing to allow pirate broadcasters to apply for LPFM licenses as long as they have voluntarily ceased operating an unlicensed station. This would reward people who purposely violated the law to

establish an unlicensed radio station. The Commission's proposal does not allow existing broadcasters to own new LPFM stations. It is certainly not fair to reward former pirates at the detriment of existing broadcasters.

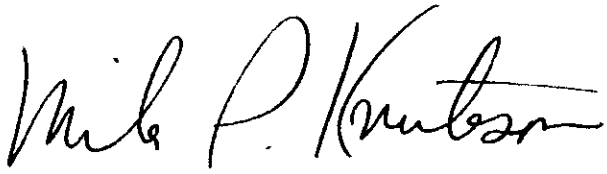
SUMMARY:

The proposal for LPFM would create huge pockets of interference. As a result, the public will be in an uproar when they have trouble receiving their favorite radio station. This means the public will face destruction of the FM band. AM radio has had its problems over the years. LPFM could mean the same for the FM band.

It is also inevitable that the addition of more radio stations (especially in the smaller markets where more frequencies are available) will create a financial hardship to many existing broadcasters. This will mean lowering the level of public service as more radio stations go to satellite or automated programming. On many stations, full-time newspeople are becoming a thing of the past. A flood of new radio stations will mean that this problem will only get worse.

Over the years, broadcasters have taking pride in serving their communities. In THEORY, more people would be served with more radio stations. However, the Commission must look at what will actually happen. The listening audience will be harmed when (1) their favorite radio station is interfered with or (2) the quality of service declines in order for existing stations to survive.

Thank you.



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