

DOCKET FILE COPY ORIGINAL

WOLF Radio, Inc.
401 W. Kirkpatrick St.
Syracuse, NY 13204
315-472-0222

July 30, 1999

Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, SW, TW-A325
Washington, DC 20554

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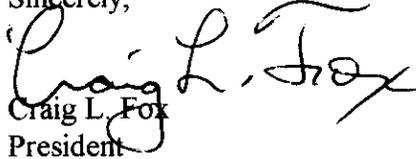
Re: Comments on Notice of Proposed Rulemaking
MM Docket No. 99-25
Creation of a Low Power Radio Service

Dear Ms. Salas,

On behalf of WOLF Radio, Inc., enclosed please find an original and nine (9) copies of comments on the above-captioned proceeding regarding the proposed Creation of a Low Power Radio Service.

If there are any questions regarding this matter, please do not hesitate to contact the undersigned.

Sincerely,


Craig L. Fox
President

Encs.

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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

To: The Commission

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COMMENTS ON NOTICE OF PROPOSED RULEMAKING

WOLF Radio, Inc. ("WOLF"), hereby submits comments on the above-captioned matter regarding the creation of a low power radio service.

1. WOLF is the licensee of AM station WOLF(AM), Syracuse, NY, and WKGJ(AM), Auburn, NY both of which operate as Class C (formerly Class IV) stations.
2. As is the case with all Class C stations, the service area suffers greatly from day to night due to the tremendous amount of skywave interference caused by other co-channel Class C stations. The Commission is remiss in not regarding AM stations in general with a need for improved service. Any establishment of additional service in the FM band should first extend to the use of FM translators by AM stations as a paramount need for the preservation and survival of stations in the AM service.
3. The Commission has in the past acknowledged the need for improvement to the AM service. The Commission established the "expanded band" which enabled only 88 stations out of roughly 5000 to have improved service. This is less than 2% of all authorized AM stations. Secondly, the amount of reduction in skywave interference as a result of the "migration" of these select stations is insignificant.

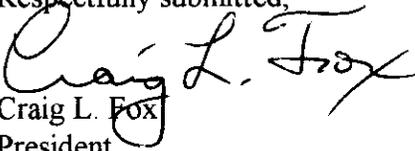
4. The Commission has not looked in depth to the serious need for improvement to the average AM station. In all of the United States, there are only dozens of 50 kW AM stations that are able to hold their ground and compete on a relatively equal footing with FM stations and there are a number of low frequency (below 1000 kHz) 5 kW stations that can maintain an economic existence, but approximately 80% of AM stations are seriously disadvantaged when compared with FM stations with which they must compete. The disadvantages are numerous: reduced nighttime power, increased nighttime interference, man-made noise, varying propagation, difference in coverage due to restrictive directional patterns, narrowed bandwidth which is far more evident at night from first adjacent skywave carriers and modulation envelopes.

5. Future digital broadcasting in the AM band will not change the effects that skywave interference has on coverage and cannot be considered as a solution to a resurgence in robustness and/or popularity of the AM band. Further, the Commission erred in not adopting an AM stereo standard until the marketplace completely lost all interest further eroding AM listening in favor of the more high fidelity sound of the FM band.

6. The Commission, in the establishment of any low power service, must seriously consider the dire need that AM stations have for the improvement of service and must allow for AM stations to be the preferred group for the use of any new low power service on FM. To ignore the deflated state of AM radio would be a slap in the face to all AM broadcasters who have been struggling for many years just to stay afloat.

7. In summary, the idea that the Commission would pass on the opportunity to help and create a new service that would further erode AM listening is unconscionable.

Respectfully submitted,

A handwritten signature in black ink that reads "Craig L. Fox". The signature is written in a cursive style with a large, looping "C" and "F".

Craig L. Fox
President

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