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To: Office of the Secretary
Federal Communications Commission
445 Twelth Street, SW, TW-A325
Washington, D.C.
20554

From: Randall C. Wright
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Columbia, Missouri
65203
(573) 446-2678

Re: Comments on MM Docket 99-25

Enclosed please find an original plus nine copies of my comments concerning the proposed Low Power FM service (Docket 99-25) by the Federal Communications Commission.

Thank you.

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Before the
Federal Communications Commission
Washington, D.C. 20554

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In the Matter of
Proposal for Creation of the Low Power FM
(LPFM) Broadcast Service
Docket No. MM 99-25

To: Federal Communications Commission

Comments of Randall C. Wright

Never before have I felt compelled to correspond with a government agency or elected official concerning a specific issue facing our industry. But, as a broadcast manager and media professional of 20 years, I have been so intrigued and excited about the wonderful possibilities LPFM would bring to our nation, I felt the need to file an official comment with the Federal Communications Commission. For this reason, I write to you as a broadcaster in full support of LPFM.

As someone intimately involved with the broadcasting business and the educational community (I designed and taught a radio broadcasting curriculum at a local high school of 2000 students and am currently completing a Master's degree in Media Management from the University of Missouri School of Journalism), I urge you to adopt the LPFM proposal as policy and move to approve the service across the United States as soon as possible. LPFM is a unique opportunity to enhance the nation's radio broadcast service in a positive way, without causing harm to current broadcasters and the transition to digital broadcasting.. It is my belief that LPFM will accomplish the following:

1. LPFM will bring local radio service back to smaller towns that have lost their radio signals through Docket 80-90 "move-ins" to larger, more lucrative markets. Through LPFM,

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local communities such as California, Missouri will likely regain a FM station after the local signal was purchased by a large group operator, upgraded and moved to Jefferson City, Missouri, a much larger market, 25 miles away. Examples like California, Missouri exist all across America as "80-90" served to decrease the level of community service in the very area those signals were originally licensed to. LPFM will solve that issue created by deregulation.

2. LPFM will provide much more diversity on the nation's airwaves through reinstating independent voices where consolidation has all but removed any opportunity for individuals and groups to obtain licenses and operate radio stations. In many communities across America, two or more megagroups own clusters of many radio stations, controlling a tremendous amount of market share from both an audience and revenue standpoint. Often, cluster stations are programmed against each other without regard to programming needs in the market. Some stations from one cluster are programmed to compete against stations from another cluster to simply weaken their market audience share and level of revenue production. In other words, some stations are simply sacrificed or wasted just to weaken a competitor. This is a tremendous waste of valuable spectrum and LPFM will serve to diversify programming choices in communities across America.

3. LPFM will allow new entrants into the business of broadcasting, expanding the number of station owners, reversing the dramatic 20% loss in owners since the Telecommunications Act of 1996 was instituted. These new owners will provide a new, fresh approach to serving communities licensed for service by LPFM stations.

4. LPFM will provide the basis for new, expanded employment opportunities in the field of broadcasting, reversing the loss of jobs created through consolidation. As someone who taught high school students broadcasting courses from 1992-1997, I know firsthand the concern

students today have over the lack of future opportunities in the field of broadcasting. The creation of LPFM stations will allow these students and countless others the opportunity they dream of in radio.

5. LPFM will provide new format and programming choices in communities that currently receive simple mainstream formats. Ethnic and niche formats will appear providing better service to all segments of the nation's population.

6. Finally, LPFM will serve to provide educational institutions across America with an affordable, technologically advanced tool to prepare students adequately for a future in the field of broadcasting. Schools like Columbia, Missouri's Hickman High School could afford to obtain an LPFM license, build and operate the station on behalf of the entire school system, training students, informing the community of happenings in the school district and providing a positive bonding experience between young people and the community. At present, this school operates a carrier-current station that sends a substandard AM signal 200-300 feet. LPFM will serve situations like that of Columbia, Missouri's public school system all across America.

But, for LPFM to be a success and become an integral part of our nation's broadcast service, some of the following guidelines should be included as a part of the service:

1. LPFM Must Be Commercial-First, LPFM must allow for both commercial and non-commercial operation of stations. By allowing applicants to pick the current non-commercial or commercial portions of the FM band as the location for their station, they will submit their preference to operate a station commercially or not. LPFM must include commercial operation or the service will be doomed from the start. Radio stations are expensive to operate and all applicants must have the option of producing revenue through the sale of commercial advertising. Groups and individuals advocating a total non-commercial LPFM service are not

considering the larger picture of monthly expenses, debt service, music licensing, payroll, etc. that play such a big part of operating a radio station. KOPN-FM, a local non-commercial station in Columbia, MO., has been close to going off the air for years because they don't have the means or the ability to produce revenue to stay on the air. **LPFM must be commercial to survive and thrive against full-power FM and AM stations.**

2. LPFM As New Class of FM Class "A" Stations-LPFM should be developed as a new class of "A" stations on the FM band. It will be vitally important for LPFM licensees to integrate themselves and their stations into the mainstream of broadcasting as soon as possible. By issuing LPFM licenses as an "A" class license, it will serve to initiate this commonality between full power and LPFM broadcasters. One of the problems with LPTV has been the lack of continuity between full power television broadcasters and LPTV owners. By making LPFM an equal to full power stations in everyway except for the issue of effective radiated power, this will serve to level the playing field between LPFM operators and full power owners. I might suggest the following alterations in classification:

Class A:	3000-6000 watts	Antenna:	328 ft.
Class A-1	1000 watts	Antenna:	328 ft.
Class A-2	100-1000 watts	Antenna:	328 ft.
Class A-3	10-100 watts	Antenna:	180 ft.

Similar in fashion to C-1, C-2 and C-3, this provides LPFM broadcasters with equal footing in terms of the being a part of the full power FM world.

3. Second and Third Adjacent Channel Restrictions Dropped-With this "equal footing" in mind, both the second and third adjacent channel restrictions must be dropped for LPFM stations. Improvements in receiver design since the rules were written decades ago will

allow these restrictions to be dropped without causing interference to existing stations or planned I.B.O.C. signals. For years hundreds of full power FM stations have been operating on second and third adjacent channels with no interference complaints. If these full power stations can do this without causing interference neither will LPFM stations of much lower power.

4. Prohibited Contour Overlap Utilized to Predict Interference-I would hope the FCC would use a prohibited contour overlap method of predicting interference, as is now easily done in the low power television service with the appropriate computer program. This will allow for the maximum number of LPFM stations across the country, even utilizing directional signals where stations can transmit while not interfering with protected signals.

5. LPFM Antennas Up to 328 Feet and With Full Bandwidth-From a technical standpoint, I would like to voice support for two issues; first, is allowing LPFM stations the option of placing their antenna's at 328 feet which is the same as full power class A FM stations. This will serve to increase the coverage area an additional two to three miles and could mean the difference between success and failure for a new station. In addition, LPFM must not be subjected to a narrower bandwidth than full-power FM stations since audio quality could suffer. Dropping sub-carriers (other than stereo) would be a possible compromise to reduce and prevent interference.

6. LPFM Ownership Cap of 10 Stations-From an ownership standpoint, I support placing a cap of 10 on the total number of LPFM stations one entity or person may own, but I do not support any type of geographic restriction on where these stations may be licensed. With the tremendous deregulation of the Telecommunications Act in place, some companies such as Cumulus and AM/FM own more than 400 radio stations across the country. While LPFM is not designed to compete with the likes of these mega-media companies, LPFM stations and their

owners should not be subjected to an entirely different set of economic rules and circumstances in order to operate a station. In fact, economics of scale allow companies such as Cumulus and other large group operators the opportunity to centralize some accounting, programming and managerial functions, thereby making individual stations less expensive to operate. Keeping costs low will be vital to the success of LPFM stations. By allowing small groups of up to 10 stations within one licensee, this economy of scale function will come into play for LPFM operators and will allow a better opportunity for success.

7. LPFM Stations Awarded on a First-Come, First-Serve Basis-The FCC should award licenses through a first-come, first-serve application process with a filing window of a specific amount of time, say a week. For competing applications, the FCC should then and only then, go to an auction process for individual licenses. I do not support any form of bidding credits and all Americans, regardless of race or sex should be equally eligible for LPFM licenses. No one should be provided preferential treatment when it comes to applying for and receiving an LPFM license. Current broadcasters and newspaper owners should not be allowed ownership of LPFM licenses.

8. LPFM With Same Regulatory Responsibilities As Full Power Stations-LPFM stations should have to adhere to the same rules and regulations full power stations do. Again, this will serve to bridge the gap between LPFM's and full power licensees and merge the two services into one solidified FM broadcast service.

Finally, I urge you to consider communities like my hometown of Columbia, Missouri and think of the possibilities for LPFM:

- The local school system broadcasting program could apply and utilize an LPFM signal to reach the entire community, not just the high school students listening in the cafeteria or

parking lot.

- Various chambers of commerce could utilize an LPFM to promote the tourism opportunities to the thousands of travelers on the nation's highways, providing a tremendous potential economic impact to the businesses of the community.
- LPFM could replace the aging and outdated Traveler's Information System (AM system) at Kansas City International Airport and at airports, parks and attractions across the country, improving the TIS system and working to clean up the AM band.
- Allowing current AM daytimers operating with 250 watts or less to apply for and receive an LPFM station only after a filing window has closed with no non-broadcaster applicants applying. The AM station would then be taken off the air, replaced by the LPFM signal in that community, thereby cleaning up the AM band and improving service to 24 hours in that market.
- Providing local churches and religious organizations the opportunity to form a partnership to own and operate an LPFM station, programming information and religious services never before heard in communities on the radio.
- Giving cities of all sizes the opportunity to own and operate an LPFM station to program city news and information ranging from city council meetings to civil defense information during times of severe weather and natural disasters.

The opportunities are endless for the usefulness of LPFM in American society and broadcasting. I again urge you to adopt LPFM in a commercial form, providing all Americans with equal opportunity to obtain a license and structure the service as a compliment to full power broadcasting holding similar classifications and responsibilities under FCC rules and regulations. The radio industry has never been stronger, posting record percentage revenue growth on an

annual basis and BIA Consulting of Washington, D.C. is projecting revenue and profit growth through 2002.

In fact, BIA states that the average cluster radio station produces as 30%-40% profit margin right now and with additional revenue and profit growth a 50% margin will not be out of the question in the near future. Radio is on good, solid economic footing and now is the time for LPFM, a service that can survive through diverse programming, service to the community and revenue generation sufficient to support the new stations.

I appreciate the thoughtfulness on the part of the FCC commissioners in their support of this proposed rulemaking and thank the commission for holding firm in the well-placed belief that there is strong support for LPFM throughout the country. Thank you.

Randall C. Wright

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Docket No. MM 99-25.