

**It's a fun thing ...**



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July 28, 1999

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**FCC MAIL ROOM**

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
The Portals  
445 Twelfth Street, SW  
Washington, DC 20554

**Re: Comments on The Proposal for Low Power FM Radio**  
MM Docket #99-25  
RM 9208  
RM 9242

Dear Commissioners,

I am a very small-market broadcaster. I am a Vietnam veteran with a family, and an *extended family of good employees* who are meeting a variety of needs in our community with hard work, dedication, and good service. None of us is getting rich operating a community-focused radio station. We have been through some tough times together.

My employees and I are adamantly opposed to the proposal for low power FM. We believe, while well intended, it may easily achieve just the *opposite* results as those sought: a substantially more cluttered FM band, heightened interference for listeners, an

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effective ruining of the *in-band, on-channel* initiative for digital broadcasting – not to mention sheer financial ruin for a majority of small market broadcasters.

The regions where much of any spectrum space is still available are small, rural, lightly-populated portions of the country--the places perhaps *least* in need of more stations, and the towns where the financial potential is weakest to support more stations.

**Existing technical rules now permit additional applicants to build new FM stations in virtually any location in the United States. Educational non-commercial FM, or commercial FM.** We are asking why you are considering putting in place a revision of established rules that will facilitate *degradation* of the best system in the world? That's precisely what's being considered here. *Within existing rules*, there is plenty of room for growth... for new applicants.

Somewhat ironic, but it was my understanding that the non-commercial FM band and rules were **originally** established to provide for the *exact purposes* that the FCC now proposes *LPFM*. If this is correct, and there seems to be adequate spectrum still available, why is a proposal that would destroy the technical integrity of the band... even under consideration?

The proposal would reduce spacing *requirements* between 2<sup>nd</sup> and 3<sup>rd</sup> adjacent channel facilities, and reduce protection between facilities. Any qualified technical engineer who works with the FM band will agree that this is a formula for disaster.

*The FCC spent years refining and enhancing a system that generally works, and works well. Why throw that system out and bring a cacophony of interference to listeners nationwide? That... is the probable result of what is on the table if you approve it. The changes, as proposed in the LPFM proposal, would generate massive pockets of interference. The general public will likely react with anger and frustration – especially those using moderately priced receivers, less expensive car radios and cheaper “hotel” type receivers.*

This already happened to AM radio. Or shall we say, *it was “allowed to happen” to AM radio. Why jeopardize a whole new band to this kind of technical chaos when it can be avoided by using what is already in place?*

While I am sure the FCC is not very likely going to take any “economic impact” into consideration, yet I can tell you... as a small market broadcaster... I see LPFM as an unmitigated crisis. The FCC has already licensed direct broadcast satellites which will be chipping away at local listeners and the advertising base that supports small-town broadcasters next year and thereafter. To add dozens of new signals to a small market economic landscape – and not force licensees of *those* signals to play by the same rules commercial broadcasters must – is patently unfair. In our company’s case, I question our ability to remain financially viable.

The mega discount stores have already eroded much of small town America's main street. If the U.S. is to maintain a "commercial" radio industry (*is it?*) there are only so many curve balls you can throw at that industry and expect to see it survive.

If this FCC management team wishes to leave a lasting legacy of re-regulating FM radio for the benefit of the public, please discard the LPFM proposal. It is *not* what it appears, and will destroy the marketplace so many Americans depend on for quality FM broadcast service.

The FCC can accomplish what it is proposing by using existing technical rules and without changing its technical spacing protections. New power levels for stations *in the non-commercial band* can be approved (for instance, 1, 3, 5 and 10-watt). By doing so the integrity of the FM spectrum will be maintained and there will be plenty of opportunity for diversity for religious organizations, educational groups, community groups and others. America's love affair with hometown radio stations continues. LPFM stations will not have adequate resources to help maintain that relationship. I have a real concern that they will dilute and fragment audiences sufficiently that the rest of us... will have great difficulty remaining viable to help perpetuate that dream.

In KTRZ's case, we help two high school "Close Up" student groups raise money each winter to help fund student trips to the nation's capitol during Close Up week. Over the past 12 years, this project has raised some \$150,000 toward travel and lodging expenses for high school students.

Could I allocate precious inventory for this kind of community involvement if there were three more stations in our town of 10,000 people? I seriously doubt it. There are power bills to pay, staff to pay—and encroachment on revenues would very likely make this kind of community-service effort an “expendable” in future years. It’s one of those things we do *because we know it should be done*, not because it is profitable. With a Pandora’s box of new low-power stations in the area, all resources will have to be focused toward **survival**. Period.

There are other problems with the LPFM proposal. It would allow most LPFM stations to operate with less regulation than conventional stations. *What about EAS?* The emergency system isn’t even addressed. All stations, LPFM included, should be required to take a role in EAS , or it doesn’t work.

**There’s an adage, “it worked so well, we quit doing it.”**

*Please don’t follow suit with, “it worked so well, we changed the rules and trashed a perfectly good system.”*

This country deserves better. LPFM is not the right answer. The right answer is already in place: *your own rules for non-commercial frequencies.*

Sincerely,

A handwritten signature in black ink, appearing to read "Kurt Browall", written in a cursive style.

Kurt Browall,  
President  
Wind River Communications, Inc.