

BLISS DOCKET FILE COPY ORIGINAL
Communications, Inc.

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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JUL 30 1999

FCC MAIL ROOM

In the Matter of)

Creation of a Low)
Power Radio Service)

MM Docket No. 99-25

RM-9208
RM-9242

Comments of

BLISS COMMUNICATIONS, INC.
OWNER OF:

Southern Wisconsin Broadcasting, LLC
d/b/a WCLO-AM & WJVL-FM

West Bend Broadcasting, Inc.
d/b/a WBKV-AM & WBWI-FM

Wisconsin Rapids Broadcasting, LLC
d/b/a WFHR-AM & WGLX-FM

Racine Broadcasting, LLC
d/b/a WRJN-AM & WEZY-FM

By Sidney H. Bliss
President and CEO

July 29, 1999

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NEWSPAPER DIVISION

The Janesville Gazette, Janesville, WI • Eagle-Herald, Marinette, WI • Daily Globe, Ironwood, MI • The Monroe Times, Monroe, WI
The Delavan Enterprise, Delavan, WI • The Week, Delavan, WI • The Jotter, Janesville, WI

RADIO BROADCAST DIVISION

WCLO/WJVL, Janesville, WI • WFHR/WGLX, Wisconsin Rapids, WI • WBKV/WBWI, West Bend, WI • WRJN/WEZY, Racine, WI

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 not achieve one of the main purposes for which it is intended.** 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 80/90 Docket created a virtual saturation of FM stations in markets which were, in many cases, barely able to economically sustain the stations already in existence. The proliferation of stations was promoted under the false assumption it would give more diversity of station ownership. Most of the 80/90s have failed economically, and in many cases, those that have persisted, took enough revenue away from the previously existing stations that none in the market were financially viable.

This situation occurred in two markets where my company owned successful stations. These were relatively small markets and when the drop-in FMs started up, they took just enough business to eliminate any future growth in our stations. In recent years, a number of the newly created stations have gone dark.

This proposal appears to be a knee-jerk response to the recent consolidation in the industry. Such consolidation is merely a reflection of the marketplace, and it is flawed judgment to think the Commission should expand on an already overcrowded spectrum, in a misguided attempt to mandate diversity.

It is also inappropriate to single out and discriminate against existing broadcasters, or newspaper owners, if this rule-making is misguidedly approved. They should be able to acquire these new classes of stations just like any other media operator, including billboard companies, Internet providers, or telephone companies.

SUMMARY:

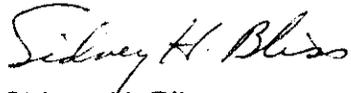
We believe that this rule-making is the same flawed reasoning that led to too many FM licenses related to the 80/90 thinking, which has now resulted in those same new licenses being financial failures.

Perhaps the FCC should require a thorough financial operating prospectus, along with associated long-term forecasts, to prove that these types of proposals are economically sustainable. Most of the small to medium size markets in America are now being served by community-oriented responsible, profitable broadcasters who can ill afford to have the market values of their companies decimated by yet another attempt by the FCC to over-saturate the FM radio spectrum.

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We believe the Commission should consider QUALITY of existing radio service as important as the QUANTITY of the service. The listening audience will be harmed when their favorite radio station is interfered with or the quality of service declines in order for existing stations to survive.

Thank you,



Sidney H. Bliss
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