

Hibernia Communications, LLC
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July 30, 1999

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
Office of the Secretary
445 Twelfth Street, S.W., TW-A325
Washington, D.C. 20554

Re: In the Matter of Creation of
a Low Power Radio Service
MM Docket No. 99-25
RM-9208; RM-9242
Comments of Hibernia Communications, LLC

Dear Ms. Salas:

On behalf of Hibernia Communications, LLC, these comments are being submitted in opposition to the Federal Communications Commission's proposals for the establishment of a new low power radio service.

Hibernia Communications, LLC's affiliated companies ("Hibernia") are the licensees and operators of seven AM stations in the following markets: Boston, Hartford, Providence, Richmond, Birmingham, Charlotte and West Palm. Hibernia is a niche AM broadcaster that brings children's radio programming to the communities it serves. Specifically, all of Hibernia's stations broadcast 24 hours per day of programming designed for children through their affiliation with ABC's Radio Disney network. Hibernia is extremely active in its markets and participates in and sponsors numerous children's events and activities. Hibernia hopes to expand the number of AM stations on which it can deliver children's programming and also hopes to bring niche programming to other underserved groups.

Hibernia can testify firsthand to the extremely competitive nature of the radio marketplace and the substantial difficulties and challenges an AM niche broadcaster faces in attempting to bring an important service like children's radio to its listeners. Based on its experience, Hibernia is extremely concerned about the FCC's proposals to add low power FM stations to the radio marketplace. The marketplace simply cannot support the addition of low

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Ms. Magalie Roman Salas
July 30, 1999
Page 2

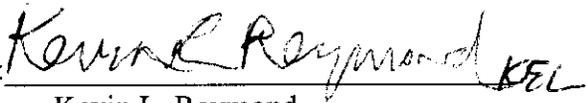
power FM stations. Given the heavily concentrated broadcast market, it is difficult enough for a broadcaster like Hibernia to survive now; it will be impossible with the influx of many new stations. Indeed, the adoption of these proposals will have the perverse effect of causing more consolidation in the broadcast industry.

Hibernia understands that the Commission does not like to hear arguments concerning competitive impact. It also believes that the Commission's proposals are well-intentioned. However, the Commission cannot and should not ignore marketplace realities. It cannot and should not sacrifice the important public services that niche broadcasters such as Hibernia are struggling to provide. In considering the comments that are being submitted in this proceeding, the Commission must recognize that its proposals will seriously hurt those members of the listening public — such as children — who are already underserved.

Accordingly, Hibernia urges the Commission not to initiate a low power FM radio service.

Respectfully submitted,

HIBERNIA COMMUNICATIONS, LLC

By: 
Kevin L. Reymond
President