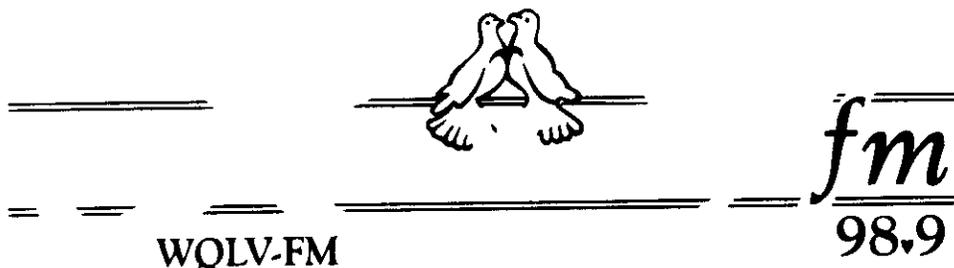


Central PA's Best **Soft Rock**



COMMENTARY: MM Docket No. 99-25

1. EXPERIENCE IN BROADCASTING:

34 Years in the Industry. Spent 5 years of red tape and construction of an A.M. station in small Central Pennsylvania town of 2000 population. Completed construction in 1975. Spent 5 years of paper work and construction of new F.M. station in small town in Central Pennsylvania with population of 3500. Went on air February, 1992. Currently the only Single Stick privately owned F.M. in 14 Central Pennsylvania counties.

2. EFFECTS OF L.P.F.M.:

(a.) SERVICE TO NON-PROFIT ORGANIZATIONS: Finding volunteers to run a 24 hour operation is totally unfeasable. Non-profits are finding it a major task to get volunteers to staff their booths at one day community events, let alone staff a 365 day a year operation.

(b.) COST TO BUILD AND OPERATE L.P.F.M.: How will the money to operate these stations be raised? From sale of 50/50 tickets? Donations from members of the organization? Pleas to the audience? (OH BOY!!! MORE PUBLIC RADIO CRIES FOR HELP!) **NONE OF THE ABOVE!** 95% OF THE OPERATING COSTS WILL HAVE TO COME FROM THE CURRENT ADVERTISING PIE OF RETAIL AND COMMERCIAL BUSINESSES! (AND THE PIE IS ALREADY TOO SMALL TO FEED THE CURRENT MEDIA CHOICES OF RADIO, TV, CABLE TV, NEWSPAPER, MAGAZINES, PENNY-SAVERS, TABLOIDS, NON-PROFIT PROGRAM BOOKS, HIGH SCHOOL FOOTBALL PROGRAMS AND YEAR BOOKS....THE LIST IS ENDLESS! (AND NOW, THERE'S THE INTERNET!))

(c.) TALENT: It takes trained, experienced and talented people to properly staff and operate a radio station if it is to be an asset to the community. The thousands of current radio stations are facing increasing challenges to find committed people with the qualifications to produce a great product. (THUS THE ADVENT OF SATELLITE PROGRAMMING AND CONSOLIDATION.)

(d.) COMPETITION: Does the market-place NEED any more competition? **ABSOLUTELY NOT!** Station after station is going dark or are being bought by large groups because the advertising pie is NOT GROWING AT THE SAME RATE THAT ADDITIONAL FORMS OF ADVERTISING MEDIUMS ARE APPEARING ON THE SCENE! **(AND BY THE WAY, HAS ANYONE MENTIONED THE INTERNET?...NOW THERE'S SOME REAL COMPETITION!)** The A.M. station I put on the air in 1975 went dark 8 months after our F.M. went on the air. WHY? **TOO MUCH COMPETITION!**

(e.) INTERFERENCE: More channels on the spectrum simply means MORE NOISE, MORE INTERFERENCE, LESS QUALITY OF SOUND (our final product), and finally....LESS LISTENERS! Currently in my market-place, we can clearly receive 37 different A.M. and F.M. signals!

SUMMARY:

What effect will L.P.F.M. have on the current Broadcast Industry and community in general? **A TOTAL NEGATIVE EFFECT!!**

- (a.) More UN-NEEDED competition to gain listeners and advertising dollars.
- (b.) More UN-NEEDED interference to an already over-crowded spectrum.
- (c.) More UN-NEEDED competition to attract trained and talented people.
- (d.) More UN-NEEDED choices of programming. (We already have 37 AM/FM channels in our market, plus TV, CABLE TV, VIDEO STORES, COMPUTER GAMES, THE INTERNET, NEWSPAPERS, SHOPPERS, MAGAZINES AND MORE..all competing for our time and a dwindling amount of advertising dollars!

To give you a sense of how competition has increased, allow me to relate these two actual events. Twenty four years ago, I sold advertising at a higher rate on a 500 watt daytime AM station in a small Central Pennsylvania coal mining town than we do today on a 6000 watt FM station that reaches 15 times more people! How could this be? Too many choices, too few advertising dollars!

Last year, a local seasonal company spent approximately \$5,000 on our station. This year, they spent \$0 with us. Why? He spent all his dollars on Cable TV, at \$1.19 per ad!....Yes, I said, \$1.19 per ad! Can anyone in radio or broadcast TV compete with that? **ABSOLUTELY NOT!**

This is my 34th year in broadcasting. During that time I've witnessed many, many changes..but nothing like I've seen in the past 5 years. Stations going dark or being bought just BEFORE they go dark! Why? It's simple...there are just too many choices and too few advertising dollars!

I still owe the bank several hundred thousand dollars for this operation! Yes, I said, "several hundred thousand dollars." I have invested my entire life in broadcasting. I have worked day and night, year in, year out, trying to serve my community and eek out a living. **IF YOUR GOAL IS TO PUT SMALL ENTREPRENEURS LIKE MYSELF OUT OF BUSINESS, OR TO PUT CONSOLIDATION IN "QUADRUPLE OVERDRIVE", THEN, PLEASE, BY ALL MEANS, PASS THE L.P.F.M. DOCKET!**