

Z / 102.9

**KZIA FM RADIO • 1110 26TH AVE S.W.
CEDAR RAPIDS, IOWA 52404-3430
PH. 319.363.2061 • FX. 319.363.2948**

DOCKET FILE COPY ORIGINAL

99-25

July 27, 1999

Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RECEIVED
JUL 29 1999
FCC MAIL ROOM

Hello!

Enclosed are my comments on the proposed low power FM rule making. I have enclosed nine copies and an original. The extra copies are for each commissioner. Have a pleasant day

Sincerely,



Robert K. Norton, Jr.
KZIA, Inc.

No. of Copies rec'd 0410
List ABCDE

with the big corporations, we get nailed from the lower end.

2.) OTHER AUDIO SERVICES: In addition to competing with other radio stations, the future holds heavy competition coming from sources like direct satellite broadcasting and the Internet. Just how much new competition can this station endure? The addition of more local low power FM would fractionalize what is already going to be a fractionalized competitive environment with the satellite and Internet service to begin with. And this doesn't even include the audio-only channel potential of HDTV.

3.) TECHNICAL. Prior to FCC docket 80-90 of the 1980's, both KZIA and KRNA (regional class C stations) easily reached the Minnesota border to the north. Now with drop-ins in surrounding markets, the stations have a hard time getting to Waterloo, Iowa, some sixty miles to the south of the Minnesota border. Last night in my kitchen (well within the 3.16 mv/m city grade contours of KZIA), a country station in Missouri was coming in loud and clear on my table radio on the KZIA frequency of 102.9 MHz. With the addition of more stations in this already crowded environment, and the elimination of adjacent channel interference protections, the coverage of these so called "regional stations" is going to be severely downgraded. I have witnessed this first hand. This is NOT theoretical. The coverage in the rural areas will all but be extinct. The addition of the low power stations will cause the existing regional stations to have coverage not much better than that of the proposed low power stations, creating a whole mess of weak ineffective media. AND, with the loss of the regional coverage of the existing class of regional stations, it is my opinion these rural areas affected will not be getting too many of these "low powered" stations to compensate.

4.) DAB. I am not an expert in this arena, however anything that interferes with the ability of this station to go to "In Band On Channel Digital Audio Broadcasting" is not good. Again without DAB we will not be able to compete.

In conclusion, I think my strongest point is what the creation of a low powered radio service would do to the regional coverage of regional Class C and B FM stations. With more stations, and less protection on the adjacent frequencies, the regional status will be all but lost, rendering these stations as city of license facilities only. The low powered stations are really only viable in metropolitan areas. The viability of a low powered station in a rural area is nil. It doesn't make sense to jeopardize all this rural coverage the country now has to gain a few stations in the metropolitan areas.

I love the business, and would like to stay in it along time. All I ask of you is a level playing field.

Sincerely,



Robert K. Norton, Jr.
Executive Vice President KZIA, Inc
Operations Manager KZIA
Chief Engineer KZIA