

Before the  
Federal Communications Commission  
Washington, DC 20554

In the Matter of  
Creation of a Low Power  
Radio Service

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MM Docket No. 99-25  
RM-9208  
RM-9242

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FEDERAL COMMUNICATIONS COMMISSION  
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To: The Commission

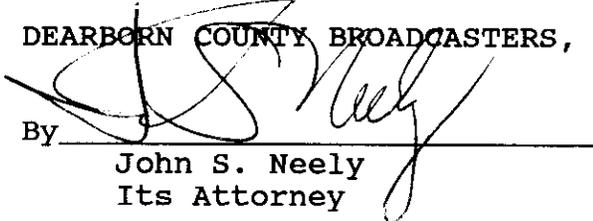
COMMENTS

Dearborn County Broadcasters, Inc., by its attorney, re-  
spectfully submits the attached omments in the above-referenced  
proceeding.

Respectfully Submitted,

DEARBORN COUNTY BROADCASTERS, INC.

By



John S. Neely  
Its Attorney

July 26, 1999

Miller & Miller, P.C.  
P.O. Box 33003  
Washington, DC 20033

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I own and operate WSCH, Aurora, Indiana and WXCH, Versailles, Indiana, both Class A FM Stations. Six years ago when I bought the Versailles Station, it had gone through several owners and was off the air. I rebuilt the station and now simulcast it with WSCH. We do local news from Versailles and Ripley County. The only way WXCH can make it financially is by simulcasting to keep expenses low. How could a LPFM make it as a stand alone in Versailles, a town of approximately 1700, or any other small town? If LPFM is approved and a LPFM is built in the cities of Aurora, Lawrenceburg and Rising Sun, Indiana, the WSCH service area, and in Versailles, Milan and Osgood, Indiana, the WXCH service are, and if each of them took just five percent of our revenue, these six LPFMs would take 30% of our revenue. We could not operate on 30% less revenue. We have been serving Southeastern Indiana for 30 years, providing daily local news and community information, local sports, etc. We provide full time jobs for 10 local people and part time jobs for several others. How can it be in the Public Interest for our stations to go broke and silent?

In the '80s, thousands of new stations were built under the '89-'90 Docket creating too many stations for the marketplace. Because of this, the Commission began allowing consolidation in 1996. I believe LPFM will be a case of history repeating itself.

I have been operating rural FM radio Stations for 30 years. I don't see how LPFM Stations can succeed financially in rural areas with small coverage areas and the very limited advertising dollars that are available from small businesses.

WXCH does local news, sports and other community programming for Ripley County. WRBI, Batesville Class A FM is also a Ripley County Station that does local programming for Ripley County. What would a LPFM station serve in this rural area that is not already served by two stations?

Yours truly

A handwritten signature in black ink that reads 'John Schuler'. The signature is written in a cursive, flowing style.

John Schuler, President  
Dearborn County Broadcasters