

# WJAG

NEWS TALK 78

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Secretary **FCC MAIL ROOM**  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C.

**RE: LPFM: Docket # 99-25**

Dear Commissioners:

My comments are prepared in response to the Commission's seeming intent to push Low Power FM broadcasting as a sanctioned occupant of the existing FM band, a move which will only revisit the debacle of Docket 80-90.

Our AM radio station, WJAG, has suffered for decades because of the protection granted clear channel stations, and now comes a proposal that will add hundreds if not thousands of new broadcast outlets to the FM. For what? To provide a voice to the disenfranchised of America? Who are they, and why haven't they utilized existing rules and opportunities to secure for themselves a "regular" broadcast license to operate? Where is the hue and cry from the underserved or unserved masses that cannot bet from the nearly 13,000 stations already on the air whatever it is the wish to find.

Unfortunately, I doubt that the Federal Communications Commission has determined that economics is of any import in this argument. Too bad, it should be. Certainly radio stations are not a typical retail business, but like other retailers, there must be a level of critical mass with

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respect to potential customers before any business can truly be viable. Even with recent consolidation, which I abhor, the economic state of too many broadcasters is anything but rosy, and it certainly will not improve with the infusion of still more radio stations.

Even if the Commission eliminates second and third adjacent channel protections, very few stations would be available in the urban markets. Serving urban communities and neighborhoods is one of the stated purposes of LPFM. Even then, will there be sufficient spectrum to satisfy even the smallest percentage of urban applicants? That leaves the more rural areas as the place where most of the applicants would be successful in putting their stations on the air.

Of course the proposal to significantly alter existing protection standards leaves those of us who are already attempting to serve our communities with the certainty of interference to our existing product and a loss of service to our listeners.

There is then the issue of development of In-Band, On-Channel digital broadcasting for existing AM broadcasters. Again, I would suggest to you that this proposal is one of the best suggestions for improvement to the AM band that has come down the road in some time. However, the possibility of IBOC surviving in the face of the new tidal wave of low power stations utilizing spectrum that IBOC would need is, in the opinion of those more technically learned than myself, improbable at best and perhaps impossible. Why not deal with IBOC first.

There has been talk of Docket 99-25 opening up new opportunities for female and minority ownership. I recall that was one of the justifications for 80-90 and the result was it did not happen, and it won't happen with LPFM. The monied people (such as the new "consolidators") will be the first in line. And if you attempt to limit their access to protect the "little guys," you will open an administrative, not to mention legal Pandora's box.

Please, please, please do not bastardize our medium and the potential for survival and service to our listeners because someone wants to provide the local tourism or church group access to the airwaves. They already have it! Each year we donate between \$75,000-100,000 worth of airtime to a myriad of such groups as part of our commitment to public service broadcasting. This is a technical issue, not a political plum.

LPFM is not on the side of science or service to America's radio audience, and I urge you to forego any further consideration of MM Docket 99-25.

Cordially,

A handwritten signature in black ink, appearing to read "Robert G. Thomas", with a long horizontal line extending to the right.

Robert G. Thomas  
Vice President/General Manager  
WJAG AM & KEXL FM