FOUR CORNERS BROADCASTING LLC
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101.3 FM 930 AM 100.5 FM

Federal Communications Commission

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Reference File Numbers:

RM-9208

RM-9242

Formal Reply Comment

July 27, 1998

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To The Commission:

In reference to the possible licensing of "low power" radio stations to be allowed in the commercial bandwidth. Please consider the following:

1A- The current staffing, by the commissions own figures and admission, is insufficient to regulate the over 12,000 commercial and educational radio, 10,000 low power television, UHF & VHF translators, 1500 commercial and educational television stations. Add to this the job of regulating the Telcos, cable industry, ham and citizens band and the task of regulating a new group of broadcast stations that would cover a small and specific area.

1B-There are currently several pirate radio stations operating in this area. Nothing is being done to shut these down and we have been told that nothing is being planned to shut these down. Should you decide to allow low power FM stations to operate, I truly believe that those that may not get one of these licenses will just continue to flaunt the law and continue broadcasting.

2-The current licensees of the commercial spectrum have time and time again been called upon to meet the needs of the communities they serve. Recent figures have placed the value of this air time in the $6,000,000,000.00 range. No other group of businesses can make this claim, and business is just what we are! In business to make a profit and serve our community. If those who make the claim that this is not true can make a specific claim against one of us, then let us work together to solve that instance.

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3- It is true, we are regulated by the FCC and Congress. This is also true of the airlines. The same claims of poor service and lack of concern to their customers needs are made against them daily. If this proposal is the fix for radio, then I urge to forward your thinking to the FAA and allow anyone that wishes to start up a low volume airline anywhere they wish and operate as they please, and serve only a small area and specific clientele. I can hear you say this is a totally illogical argument, there are safety issues in flying. Please remember that in cases of local emergencies and weather situations where public safety is the prime concern, people turn to radio for the information. There have been thousands of man hours and countless dollars invested in revamping the EAS system to provide this critical information. We have yet to figure out how we include our brothers in the cable industry in this mix, and now you want to allow space for numerous stations for what appears to be amateur broadcasters. The idea of allowing anyone with $250.00, (equipment estimate from ads currently running on the internet at pirate radio sites) the right to interfere, and destroy a business that provides community information, employment for thousands, and most critical, lifesaving public safety information just because the proponents of this idea say it is their first amendment right, is the truly illogical argument.

4- The same first amendment that has been used against the free operation of commercial broadcasting, cannot be used to further destroy it. Our advertising content and verbiage is restricted and monitored, equal time is mandated, political advertising is regulated and stations can be sited and fined for using language and expressions found on every library shelf and magazine rack in the country.

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5-There is a massive amount of ink and paper for the written word to be disseminated. The internet and computers make written and verbal communication child's play. Fiber optics has made the amount of video and audio available on cable practically infinite. Satellite dishes have made over 500 channels available both for audio and visual consumption. The FM broadcast spectrum is finite. Interference has become a serious consideration with the existing tenants on the FM band.

6-The 80-90 docket of the last decade was implemented in part as an effort to encourage minority investment in broadcasting. This failed as large corporations and large groups consolidated their holdings in the larger markets with these new stations. The only things that was accomplished by adding stations to the already overcrowded commercial spectrum was the further decline in the ability of broadcasters to serve an audience and yes, make a profit.

7-Recent figures indicate that less than 50% of radio stations in this country make a profit. In our market of less than 50,000 people, there are 27 AM & FM licensed radio signals available. Now with the advent of Internet broadcasting, programming from all over the country is available. It is our mission and privilege to serve the community of La Plata County, Colorado. We have resisted the path of automation and satellite opting to provide live broadcasters and localization. We are not profitable, but we are necessary and appreciated by our listeners.

8- I have had the privilege of working in radio for over twenty -five years and have worked in every area of this business. I have watched the industry fight to become independent of regulation. I have survived the onslaught of new competition and the relegation of radio to being an afterthought from the government and advertisers.

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I am currently watching the medium be homogenized by large corporations into a group of satellite juke boxes and cloned radio stations. Is the answer to provide more signals?

Again, I site the 80-90 docket that was intended to expand the products available to the listeners. These are the same signals now being consolidated by large companies under various names that carry the same products.

IN SUMMARY

I urge you to please consider the long term effect of your planned actions. Should you decide to allow the further decay and destruction of the FM spectrum, many small market broadcasters will be placed in a position where local public service and news information is replaced by nationally syndicated programs and local broadcasters are replaced by imported programs in an effort to stay on the air. Please do not allow this to happen.

Respectfully yours

Ward S. Holmes

General Manager

Four Corners Broadcasting

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