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Magalie Roman Salas
Office of the Secretary
TW - A306
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Enclosed are the Original plus 11 copies of the Comments of Kenneth R. Radant, President and General Manager of WBCH FM/AM - Barry Broadcasting Company regarding MM Docket No. 99-25, RM-9208 & RM-9242.

Thank You.

Kenneth R. Radant

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COMMUNICATIONS

Before the
Federal Communications Commission
Washington D.C. 20554

In the matter of:

MM Docket No. 99-25

Creation of a Low

RM-9208

Power Radio Service

RM-9242

Comments of
WBCH FM/AM (Barry Broadcasting Co.), Hastings, Michigan
by Kenneth R. Radant, President-General Manager

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List ABCDE

WBCH

AM
1220

RADIO

FM
100.1

Office and Studio

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

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AUG 2 1999
FCC MAIL ROOM

Re: Comments on the Proposal for Low Power FM Radio (LPFM)

MM DOCKET NO. 99-25

Dear FCC Commissioners and Staff:

I began in Radio in 1953, then, in 1958 became employed at WBCH in Hastings, Michigan initially an AM Daytimer. Approximately 36 years ago I began investing over the course of many years until finally my wife and I were able to buy all the stock in what today is a small family-held corporation.

In 1968 we obtained a license for a 3KW FM station, at 100.1, short spaced—by 4.51 km with WITL-FM, a Class B at 100.7, Lansing, MI, leaving WBCH ineligible to apply for 6KW unless the Commission changes some rules and grants us some relief! 6KW would benefit us greatly particularly in the hilly terrain west of us in the Gun Lake-Yankee Springs State Recreation Area. Furthermore, somewhere in the neighborhood of 60% of the work force in this county is now employed outside Barry County, which means as people



commute they very much need to keep up with school closing announcements and other local developments at home!

With the above background information, I trust you will understand why I find it so ironic and such a paradox that as long time broadcasters, we are not allowed to do anything to improve our signal while at the same time the LPFM proposal would create so many new areas of interference and that local coverage would be damaged so tragically.

Everyone wants to own a Radio Station and I fully appreciate that consequently the Commission has already received a lopsided number of comments filed from those in favor of LPFM. I am also told the Commission received over 13,000 requests for a low power station last year. When it finally dawns on the vast majority of these people that there just isn't enough spectrum for each of them to be granted their own station, I can only imagine how popular the FCC and Congress will be with these persons and groups! An FCC that already complains about not enough money and not enough help appears to be chomping at the bit to take on an increased regulatory and enforcement burden; and be warned that those "pirates" who don't succeed in getting a legal license indicate they'll still be around to make the Commission's life miserable.

I believe that one reason more existing commercial broadcasters have not filed comments on the Proposal for Low Power FM Radio is that the stations with high power feel LPFM will not greatly affect them. No, the biggest injury by far will go mainly to the small market stations in the shadow of the major population centers where the little guys already struggle for listeners and advertisers. Furthermore, to the north of us, FM stations in Ionia, MI and Greenville, Michigan have long since ceased to be licensed to those communities and are now relocated to Grand Rapids, Michigan with more power and bigger coverage areas. It is for those of us who remain in our little communities that LPFM will be the bitterest pill to swallow from increased interference and a loss of service to our listeners.

Churches, special interest groups and anyone who was ever fired from a commercial radio station now wanting their own LPFM is a noble thought with perhaps an unbalanced amount of "populist appeal", however as a responsible broadcaster and a responsible citizen, I have no desire to see groups such as militia groups, clamoring for a broadcast station license. I believe stewardship and a great amount of responsibility are still desired and required in broadcasting and have serious doubts the Commission could ever possibly have the time or resources that would be required to learn about the character and motives of hundreds and thousands of new LPFM applicants.

Sincerely,

A handwritten signature in black ink, appearing to read "Kenneth R. Radant". The signature is fluid and cursive, written in a professional style.

Kenneth R. Radant

President/General Manager

WBCH FM/AM

119 W State Street

P.O. Box 88

Hastings, MI 49058