

RECEIVED

JUL 3 0 1999

KERT
FM 104 • AM 570

EX PARTE OR LATE FILED

FCC MAIL ROOM

The Honorable William Kennard, Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: MM Docket No. 99-25 ✓

Dear Chairman Kennard,

As a veteran of over 34 years in radio station management in markets from large to small I have not been aware of an issue as controversial and potentially damaging to our industry as the new proposed Low Power FM Radio service.

Should the new proposed LP1000, LP100, and Microradio services actually get on the air the resulting chaos would be devastating to those of us broadcasters who put our trust in FCC policies regarding the numbers of radio stations allowed on the air in our respective markets (economic devastation) and the degradation of our signals through relaxation of second and third adjacent frequency protection (technical devastation).

The integrity of IBOC DAB would unquestionably be compromised prior to its even getting started.

EAS, which we have all worked long and hard to update, would be a shameful shambles of what it is supposed to be.

Proposing two or more different sets of licensing and operating standards, in addition to being downright unfair, would be virtually unenforceable.

Whether these new services would be commercial or non-commercial has not been openly debated, and most certainly should be. I feel, unquestionably, that all 3 should be non-commercial, should they actually be allowed on the air.

No. of Copies rec'd _____
List ABCDE

0



SUNRISE BROADCASTING INC.

And finally, please allow me to state that the intended purpose of these new services would not be met when:

A: licensees put nationally syndicated satellite programming on the air--not the "local programming" you desire.

B: the stations are sold to mega-groups as authorized in Docket 80-90.

Our state is one of the poorest in the nation and we are in an extremely low-income county; the addition of new signals would be economically and technically disastrous to us.

Please do not move forward on the proposed low power FM service.

Sincerely,



G. Allen Lumeyer
Vice President/General Manager

Great Country