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**AUG 20 1999**  
**FCC MAIL ROOM**

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the matter of )  
MM Docket 99-25 )  
FCC 99-6 )  
Proposed Low-Power FM Service )

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Trident Media and Broadcasting, Ltd., an Illinois corporation, respectfully submits the following comments in reply to issues raised concerning the proposed Low-Power FM (LPFM) radio broadcasting service.

Trident responds to concerns of possible interference between LPFM stations and full-service stations by stating that there is no foundation for any such concern. There are numerous FM radio stations which have been operating "short-spaced" to other full-service stations for many years with no interference concerns, and the notion that stations of much lower power could cause objectionable interference is absurd. If 3- and 6-kilowatt stations do not cause interference to co-channel and adjacent-channel stations, it is impossible for an LPFM station to cause such interference.

In response to comments filed by stand-alone AM station owners, Trident can sympathize with their plight. Society and advertisers today view AM radio as a "graveyard" for old radio, and stand-alone AM operators find it hard to make ends meet due to this mindset. While Trident DOES NOT believe that AM radio is "barren territory", it would encourage the

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Commission to consider allowing owners of stand-alone AM stations to own LPFM stations. Furthermore, Trident would also suggest that owners of Part 15 AM stations and Low-Power Television (LPTV) stations be allowed to own LPFM stations, so that they may be better equipped to serve their local areas.

Finally, Trident responds to the blatant attempts of the National Association of Broadcasters and others in the radio industry to squelch the LPFM issue. All things considered, these parties have raised no legitimate reason why LPFM radio should not come to pass. As mentioned before, the interference concerns, which have been exploited by these parties, have no basis, and the NAB's argument that radio is sufficiently diverse is a smokescreen, and a very poor one at that. Listeners are becoming extremely upset at not being able to go anywhere in the country and get away from the same six "radio stations", which are actually satellite transponders used by station owners who are, quite frankly, too lazy to work for the good of their listeners and/or too cheap to hire the personnel to do the job. This is another reason why LPFM is so desperately needed. The listeners are not being served by radio in its current state, and this is evidenced by the large number of comments from the public in favor of LPFM.

Once more, Trident encourages the Commission to focus on the comments from the listening public when considering the

LPFM services. Furthermore, Trident would go as far as to ask the Commission to consider excluding comments from within the industry from consideration in this proceeding for the specific reason that it is the public who will benefit from LPFM's passage or suffer from its demise. The listeners should be heard above all others in this proceeding, as it is those listeners for whom we are all supposed to be working.

In answer to the question, "If Trident is a broadcasting company, why does it not side with its counterparts?", we are not afraid of competition as our "counterparts" appear to be. Trident welcomes competition, as competition keeps everyone sharp and "on the ball". Furthermore, it is apparent from the large number of public comments that the listeners want LPFM. They want it because they feel that they need it, and if they need it, we should give it to them. That is why we are broadcasters, and that is why it is imperative that LPFM becomes a reality. Lastly, the dismissal of LPFM would very likely signal the start of a massive public rebellion in the form of hundreds, perhaps thousands, of "pirate" stations, which would be the real threat to the integrity of the FM spectrum. LPFM is a controlled means of bringing diversity and localism back to the airwaves, and therefore is the best case scenario.

Trident respectfully requests the Commission's careful and thorough consideration of these reply comments, and in turn, a final stamp of approval for the LPFM radio service.

Respectfully Submitted,



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President

Trident Media and Broadcasting, Ltd.

11 August 1999

In reply refer to:

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