

1 Before the

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3 FEDERAL COMMUNICATIONS COMMISSION

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5 Washington, D.C. 20554

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7 In the Matter of

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9 Creation of a Low Power Radio Service

MM Docket No. 99-25

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11 To: The Commission

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13 REPLY COMMENTS

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15 The State University of New York - Oswego, the FCC licensee of public radio stations WRVO,
16 Oswego NY; WRVN Utica, NY; WNYO, Oswego NY; WSUC, Cortland NY; WRVJ, Watertown,
17 NY and WRVD Syracuse NY, submit these Reply Comments in the above-referenced
18 proceeding on LPFM.

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20 We strongly support the initial Comments in this proceeding filed by the Public Radio Regional
21 Organizations (the "PRROs"), the Station Resource Group ("SRG"), the Corporation for Public
22 Broadcasting ("CPB"), and National Public Radio ("NPR")

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24 Based on our understanding of the initial Comments of the public radio industry groups, LPFM
25 will adversely affect public radio, in that it will result in (l) the introduction of an intolerable
26 level of new interference throughout the FM band, with public radio bearing the brunt of the

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1 effects

2 of new interference because of its typical program modulation; (ii) jeopardization of the
3 substantial federal, state and private investment in
4 public radio; (iii) an unknown (and unknowable) impact on public radio conversion to digital
5 audio broadcasting; (iv) loss of existing public radio FM translator and satellite/repeater
6 service; (v) loss of existing public radio service outside protected contours; and (vi) potential
7 loss of subcarrier services, particularly radio reading services for the print disabled.

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9 We urge the Commission not to sacrifice our public radio stations and our public radio
10 listeners for the illusory benefits of LPFM. We urge the Commission to look for alternate ways
11 (outside the FM band) to accommodate the proponents of LPFM, if it believes any such
12 accommodation is appropriate. We ask the Commission to pay heed to the Comments of our
13 public radio industry groups (PRROs, SRG, NPR, and CPB) and to treat those views as our
14 views in this proceeding. We request that the Commission review with care the "listening
15 tests" on the CD ROMs submitted with NPR's Comments -those listening tests document the
16 intolerable interference that LPFM will cause if authorized as proposed in this proceeding.

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18 We state unequivocally our firm belief that the record in this proceeding does not support the
19 creation of LPFM in the FM radio band.

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21 Respectfully Submitted,

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23 By:John E Krauss

24 Title: General Manager-The WRVO Stations

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26 Date: August 31, 1999

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