

MAGALIE ROMAN SALAS

OFFICE OF THE SECRETARY, TW-A306 RECEIVED

FEDERAL COMMUNICATIONS COMMISSION SEP - 2 - 1999

445 12TH ST S.W.

WASHINGTON, D.C. 20554

DEAR MS. SALAS :

AUGUST 29, 1999

REPLY COMMENTS TO NPRM, MM DOCKET NO.
99-25 FOLLOW:

BIG MONEY IS STRENGTHENING ITS STRANGLEHOLD
OVER ACCESS TO THE PUBLIC AIRWAYS, AS
TESTIFIED BY THE FOLLOWING :

- (1) "EVANGELICAL CHRISTIAN PROGRAMS ARE
HEARD REGULARLY ON 1,616 RADIO STATIONS
IN THE UNITED STATES..." TO COUNTER THAT
"DOMINATION", "A GROUP OF WEALTHY ROMAN
CATHOLIC ENTREPRENEURS... SOME BILLIONAIRES..."
HAVE STARTED "CATHOLIC FAMILY RADIO" WHOSE
"GOAL IS TO OWN STATIONS IN 40 OF THE TOP 50
RADIO MARKETS." (NYT REPORT IN SEATTLE TIMES, 8/15/99).
- (2) YOUR RECENT RULING WHICH FURTHER OPENS
UP MULTIPLE RADIO/TV STATION OWNERSHIP
IN ONE "MARKET" BY A SINGLE OWNER.
(NYT, 8/26/99)

REPLY COMMENTS TO NPRM, MM DOCKET 99-25 (CONT)

AND TO UNDERSCORE THE EFFECT MEDIA-GIANTISM HAS ON SUCH CLOSELY-KNIT COMMUNITIES AS VASHON-MAURY ISLAND, WE NOTE THE FOLLOWING:

THE APPROXIMATELY 11,000 RESIDENTS OF V-MI WERE RECENTLY INVADED BY 6-8,000 OFF-ISLANDERS WHO CAME TO ATTEND A POLITICAL "PICNIC".

OUR LOCAL NEWSPAPER REPORTED THAT "ONLY A HANDFUL OF ISLANDERS" SHOWED-UP.

HOW DID ISLANDERS REACT TO THIS HUMAN FLOOD? ONE COULD NEVER FIND-OUT THROUGH THE "MEDIA MARKET" OF WHICH V-MI IS ASSUMED TO BE A PART. FOR THE SEATTLE-TACOMA "MARKET", V-MI IS NOT A PLACE WHERE REAL PEOPLE LIVE, BUT RATHER A "VENUE" OR EVEN A "THEME PARK."

SO, EVERY PASSING DAY EMPHASIZES THE FACT OF OUR BEING UNDERSERVED BY A MEDIA MANDATED TO SERVE THE PUBLIC. WE CONTINUE TO URGE YOU TO MAKE THE LPFM PROGRAM A REALITY, SO AS TO GIVE A DEDICATED, INDEPENDENT VOICE TO THE CURRENTLY VOICELESS.

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SEP - 2000

William Marshall

VOICE OF VASHON

P.O. BOX 913, VASHON, WA 98070

206-463-5275

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SEP 2 1999

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

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In the Matter of)	
)	
Creation of a Low Power Radio Service)	MM Docket No. 99-25
)	
To: The Commission		

REPLY COMMENTS

The Elkhart Community Schools, the FCC licensee of public radio station, WVPE-FM, submit these Reply Comments in the above-referenced proceeding on LPFM.

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

Based on our understanding of the initial Comments of the public radio industry groups, LPFM will adversely affect public radio, in that it will result in (i) the introduction of an intolerable level of new interference throughout the FM band, with public radio bearing the brunt of the effects of new interference because of its typical program modulation; (ii) jeopardization of the substantial federal, state and private investment in public radio; (iii) an unknown (and unknowable) impact on public radio conversion to digital audio broadcasting; (iv) loss of existing public radio FM translator and satellite/repeater service; (v) loss of existing public radio service outside protected contours; and (vi) potential loss of subcarrier services, particularly radio reading services for the print disabled.

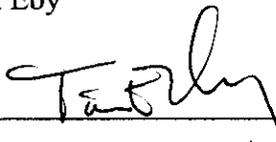
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We urge the Commission not to sacrifice our public radio stations and our public radio listeners for the illusory benefits of LPFM. We urge the Commission to look for alternate ways (outside the FM band) to accommodate the proponents of LPFM, if it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

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

Respectfully Submitted,

Tim Eby

By: 

Title: Station Manager

Date: August 27, 1999