

ORIGINAL

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

In the Matter of)
Creation of a Low)
Power Radio Service)
)
)
)

MM Docket No. 99-25
RM-9208
RM-9242

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: The Commission

REPLY COMMENTS OF COX RADIO, INC.

Cox Radio, Inc. ("Cox"),¹ by its attorneys, submits herewith its reply comments in response to the Commission's Notice of Proposed Rule Making² proposing the creation of a new low power FM ("LPFM") broadcast service. Cox stated in its initial comments that relaxing existing interference protections to permit the creation of an appreciable number of LPFM stations was unreasonable and not in the public interest. Such a relaxation would create numerous swaths of interference affecting existing FM listeners in densely populated areas and disproportionately harming would-be LPFM licensees. LPFM service would not further the Commission's intended goals and substantially would hinder advancements in digital radio technology.

Cox has reviewed the comments filed in this proceeding and overwhelmingly is persuaded that implementation of the proposed LPFM service would create substantial amounts

¹ Cox, either directly or through its wholly-owned subsidiary CXR Holdings, Inc., owns and operates over fifty AM and FM radio stations throughout the United States.

² Creation of a Low Power Radio Service, *Notice of Proposed Rule Making*, MM Docket 99-25, FCC 99-6 (rel. Feb. 3, 1999) ("Notice").

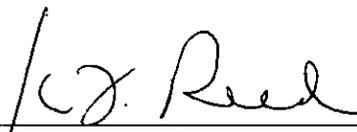
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of harmful interference to FM listeners. As the technical information submitted by the National Association of Broadcasters ("NAB") and the Consumer Electronics Manufacturers Association ("CEMA") plainly indicates, the proposed relaxation of existing interference protections would result in extensive and harmful interference to existing FM receivers. Cox could not find any submitted comments that reasonably might refute these technical findings.

For these reasons and those previously submitted, Cox respectfully urges the Commission to refrain from implementing the proposed LPFM service at least until the completion of a rigorous economic and technical study that, at a minimum, would address the issues raised in NAB's and CEMA's technical evaluations. The Commission must ensure that existing FM listeners can continue to rely upon their free, over-the-air service and will be protected from the introduction of harmful interference. In the meantime, inexpensive, fully constructed AM stations remain available as opportunities for new entrants.

Respectfully submitted,

COX RADIO, INC.

By: 
Kevin F. Reed
Elizabeth A. McGearry
Scott S. Patrick

Its Attorneys

Dow, Lohnes & Albertson, PLLC
1200 New Hampshire Avenue, N.W.
Washington, D.C. 20036-6802
202-776-2000

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