

**KSHN
"SHINE"**

**F.M. 99.9
ALL NINE**



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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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Liberty, Texas 77575
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25 MAY 1999

RE: DOCKET # 99-25

PAUL GORDON
445 12TH ST. SW, ROOM 2C223
WASHINGTON, D.C. 20554

DEAR MR. GORDON:

WHEN I CALLED TO ASK HOW TO FILE COMMENTS ON F.C.C. LOW POWER FM CONSIDERATION, I REALIZED WHY THERE HAVE BEEN SO FEW COMMENTS FROM BROADCASTERS. IN MY PARTICULAR CASE, AS OWNER OF A VERY SMALL RADIO STATION WITH A SMALL STAFF. HAVING TIME TO SERVE OUR COMMUNITY, COVER THE NEWS, RUN THE STATION AND THEN TRY TO FOLLOW ALL THE INSTRUCTIONS FOR COMMENTS TO THE F.C.C., WITHOUT AN ATTORNEY ON STAFF, IS QUITE A CHALLENGE. SO I WILL DO THE BEST I CAN. FORGIVE ME WHERE I HAVE FAILED.

EVERYTIME I DO THIS I REALIZE THAT THE NON-BROADCASTER WILL PROBABLY VIEW MY COMMENTS AS SOMEONE JUST TRYING TO PROTECT THEIR OWN INTERESTS. I CAN NOT DENY THAT IN A SHRINKING MARKET PLACE THAT MAY BE PARTLY TRUE, BUT NOT ENTIRELY. MORE AND MORE BUSINESSES IN OUR TOWN ARE CHAIN OPERATION'S WHO PUT THEIR ADVERTISING BUDGETS MOSTLY IN BIG CITY RADIO AND TV STATIONS. LOCALLY OWNED STORES, WHO DO HAVE LOCAL ADVERTISING BUDGETS, ARE FAR FEWER IN NUMBER.

...MUSIC MIXED WITH THINGS THAT MATTER.

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William R. Buchanan
President/General Manager

Trinity River Valley Broadcasting Co.

ADDED COMPETITION FOR THOSE DOLLARS WITH CABLE TV, SMALL NEWSPAPERS, MAILERS AND OUT OF TOWN RADIO STATIONS TRYING TO SPREAD OUT THEIR SALES EFFORT WILL CERTAINLY IMPACT THE SMALL "MOM AND POP" OWNED STATION, BUT THAT'S LIFE. .

HOWEVER, THE MORE IMPORTANT ISSUE IS THAT THE F.C.C. HAS BEEN ADAMANT IN PAST YEARS ABOUT THEIR TECHICAL RULES, ESPECIALLY WHERE IT COMES TO INTERFERENCE WITH OTHER STATIONS. NOW YOUR AGENCY IS, IN EFFECT, SAYING THAT NONE OF THAT IS IMPORTANT IF WE CREATE ENOUGH NEW RADIO STATIONS.

SITTING HERE IN A MARKET WITH MORE THAN 60 PERFECT RADIO STATION SIGNALS COMING INTO MY SERVICE AREA OF AROUND 42,000 POPULATION CAUSES THIS MICRO-MINI MARKET OPERATOR TO WANT THE MOST INTERFERENCE FREE SIGNAL POSSIBLE TO DO OUR JOB FOR THE LOCAL COMMUNITY. OF THE OVER 60 STATIONS WE ARE THE ONLY ONE SERVING LOCAL INTERESTS OF OUR COUNTY, BUT THE OTHERS ARE GIVING AWAY THE BIG BUCKS AND PRIZES DURING RATING PERIODS AND IT IS HARD TO COMPETE.

I HAVE BEEN A CONTINUAL TINY VOICE FOR DIVERSITY IN OWNERSHIP. APPAARENLTY THE F.C.C. HAS ALTERED THEIR FEELINGS AT LEAST WHERE IT CONCERNS ALL THE RULES THAT ENCOURAGE THE HUGE CONGLOOMERATES TO GOBBLE UP EXISTING RADIO STATIONS. I WILL TELL YOU THAT DIVERSITY IN OWNERSHIP DOES BRING THE BEST POSSIBLE PRODUCT. THE COOKIE CUTTER

PROGRAMMING OF THE CHAINS RARELY EXISTS WHERE THERE IS DIVERSITY. AS ANYONE IN BROADCASTING KNOWS THE REAL DIVERSITY IN OWNERSHIP WITH MINORITIES IS OPERATIONS LIKE OURS. WHETHER BLACK, BROWN, OR WHITE OWNED THE REAL MINORITIES IN RADIO AND TV OWNERSHIP IS THE COMPANY WITH ONE, OR TWO OR THREE SMALL STATIONS WHO ARE REALLY WORKING TO SERVE A COMMUNITY.

I HAVE ALWAYS CONCEDED THAT THE GUY WITH THE MOST TOYS GETS TO HAVE THE PARTY BUT FLOODING THE COUNTRY WITH THOUSANDS OF NEW RADIO STATIONS WHILE CANNIBALIZING THE PROTECTIONS AGAINST INTERFERENCE SURELY DOESN'T HELP WITH DIVERSITY IN OWNERSHIP. ALL YOU ARE SAYING IS THAT MORE IS BETTER WHETHER OR NOT YOU CAN ACTUALLY LISTEN TO ANY OF THEM. IT CERTAINLY INSURES THAT LITTLE FOLK – REGARDLESS OF OUR RACE OR NATIONALITY, WHO HAVE WORKED OUR WHOLE LIFE FOR A PIECE OF THE AMERICAN PIE, WILL FAIL OR BE TERRIBLY INJURED. THE BIG OPERATIONS CAN WAIT OUT THE STORM, BUY UP THE COMPETITION AND MOVE ON. WE CAN NOT.

THE HEART BREAK IS THAT WHEN IT IS ALL SAID AND DONE HOW MUCH REAL DIVERSITY IN OWNERSHIP WILL WE HAVE?

PLEASE CAN'T WE DO WHAT ALL KNOWLEDGEABLE ENGINEERS HAVE SUGGESTED. I DON'T CLAIM TO HAVE ALL THE ANSWERS BUT SURELY MAKING AVAILABLE THE PRESENTLY UNUSED AM AND FM

FREQUENCIES TO A MORE DIVERSE OWNERSHIP IS BETTER THAN CREATING ALL OF THESE NEW INTERFERENCE PROBLEMS. FOR ALL THE KING'S HORSES AND ALL THE KING'S MEN IT WILL BE HARD TO PUT THIS HUMPTY DUMPTY TOGETHER AGAIN. WHAT I FEAR MOST IS THAT ONCE CREATED IT WILL BE SOMETHING AKIN TO PUTTING THE TOOTHPASTE BACK IN THE TUBE.

I HAVE INVESTED ALL THAT I CAN IN MINORITY SCHOLARSHIPS IN MINE AND THE NEIGHBORING COMMUNITY BESIDES THE MINORITY BEGINNER ANNOUNCERS WE HAVE TRAINED. I TAKE GREAT PRIDE IN THEIR SUCCESS, DESERVED OR NOT, IN BROADCASTING AND OUT. I AM ALSO WILLING TO PARTICIPATE IN PRIVATE SECTOR EFFORTS TO PROVIDE LOAN OR GRANT MONEY TO HELP MINORITIES BUY EXISTING STATIONS OR FILE FOR NEW ONES ON EXISTING FREQUENCIES.

THERE MAY ALSO BE OTHER ANSWERS TO DIVERSITY IN OWNERSHIP BUT CREATING NEW INTERFERENCE THAT HURTS THE LPFM OWNER AND THE EXISTING STATION, IN MY OPINION, SHOULD NOT BE ONE OF THEM

RESPECTFULLY SUBMITTED,

**KSHN-FM
2099 SAM HOUSTON
LIBERTY, TEXAS 77575**

A handwritten signature in cursive script that reads "Bill Buchanan". The signature is written in black ink and is positioned to the right of the typed name.