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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

April 16, 1999

The Honorable William Kennard
Chairman
Federal Communications Commission
Washington, D.C. 20554

Dear Mr. Kennard;

I am very concerned about the Commissions direction on low power FM service and would like to take a moment of your time to explain.

First, the impact of your proposal will not affect broadcast as a business in large markets but will have a devastating impact on small market broadcasters. Putting in a number of 1000 watt stations in markets such as Seattle where most FM stations are fifty thousand watts or more, will have very little impact and yes, very well could lead to additional minority ownership which I think is commendable. However, in the small markets of America, where most of us serve communities with 1000 watt AM stations or 3000 Watt FM stations, the new service will provide better service than those of us limited to small AM stations can offer.

My wife and I have been small market broadcasters for nearly thirty years, we serve our community well and enjoy being a community broadcaster. I will agree that being a community broadcaster seems to have disappeared in the large and medium markets, however, it hasn't in small market America and I don't see that changing. Most of us put in long hours in this business for very little pay, but we like what we do. You don't see many minority ownership's in small markets because there are few minorities in towns of twenty thousand and most women don't get into broadcast ownership in these small towns because the financial reward is pretty small.

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We live in an area of Washington State, the Olympic Peninsula, that is governed as much by the Canadian treaty as our own FCC. We have tried for years to serve a small town called Sequim, just fifteen miles to the East of us, with radio service. We have hired the best engineers we could find and none of them have been able to improve our 1000 watt AM stations coverage or find an FM frequency for the area. We have wanted to serve Sequim with emergency information as well as local public affairs and news. Now this new proposed service comes along that will offer better service than we can offer. I feel liked I've been slapped in the face. Our engineer in Seattle, Ben Dawson tells me that because the Canadians already license such service, that our area could see as many as 8 or 9 new 1000 watt FM stations and I can tell you, that living in an area that has high mountains, these new broadcasters signals at 1000 watts will travel much farther than your proposed 9 mile radius. Most small towns, such as ours, one end of town to the other is less than three miles.

I would hope that the commission would take the small market situation into account and if the new low power service proposal is to proceed that you do not allow 1000 or even 100 watt facilities, but instead, a power of 10 watts which will then have the same impact on small market broadcasters as the 1000 watt stations will have on the major markets.

If you fragment the small portion of the advertising dollar that small market broadcasters now receive, no one will be profitable and community service will diminish. Stations that are financially strong and profitable are able to serve well. Those areas that are already fragmented with too many stations, don't serve their communities well and make business decisions that hurt all of us who want to do a good job.

Please consider my thoughts as you proceed with this new proposal and please, don't hesitate to call me if you would like.

Sincerely,



Jim MacDonald