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April 16, 1999

OFFICE OF THE CHAIRMAN

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The Honorable William Kennard, Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Mr. Chairman:

The Notice of Proposed Rulemaking on 'low-power FM' (microradio) at the FCC has me worried, and that is the subject of my letter.

Maintaining an interference-free environment is one of the FCC's charges. But this proposal eliminates that protection by adding these new low-power stations. The reality of this is that in most major markets, no low-power stations could be added without reducing the interference protection for 2nd and 3rd channels.

Digital audio broadcasting is the coming technology; yet this Notice does not recognize the conflict that will develop as local stations begin to add digital signal on top of their analog signals within the same band and channel. The addition of low-power stations would seriously reduce the ability of digital signals to work properly without interference.

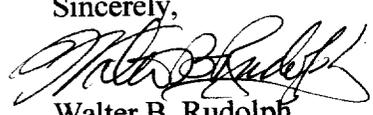
I also do not understand how the proposed ownership limits for low-power stations, or the Commission's desire to license certain favored groups, can be reconciled with the Telecommunications Act of 1996 or the Balanced Budget Act of 1997.

I hope there will be serious consideration by you and your fellow commissioners to placing this idea of low-power FM stations on hold until or unless these technical issues are resolved, and the rules for digital audio broadcasting are specified.

Our listeners depend on us, as local broadcasters, for local news, weather and emergency information. As a 'public' broadcaster in the educational band, we also provide significant public service in programming normally not of interest to commercial broadcasters. The Notice on low-power FM puts the current public service programming at risk, especially when technical issues contradict present expectations, and the yet-to-be-clarified issues of digital audio broadcasting.

Thank you for your consideration.

Sincerely,



Walter B. Rudolph
General Manager

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