

J. Michael DeMarco  
Vice President & General Manager

MM 99-25



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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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

Dear Mr. Kennard,

The notice of proposed rule making that the FCC has begun concerning micro-radio (low powered FM's), creates great concerns. As the FCC continues to ensure interference freedom for radio stations, it appears that some 4,000 micro-radio frequencies with power ranging from 1,000 watts to 10 watts can do nothing but create additional interference. I am concerned that the addition of these frequencies, regardless of power, have the potential to create interference issues.

Unless I misunderstand the rule making, it appears that second and third channel interference protections must be reduced in order to make room for the low power FM stations. With the reduction of these protections, the FM band will become cluttered and the listener will ultimately suffer, as the quality of the signal is diminished.

With some 13,000 (AM and FM) radio stations filling the airwaves today, the addition of 4,000 more seems excessive. Those 4,000 low-power licenses would represent an increase of almost 25% in total broadcast facilities.

With the planned transition to digital audio broadcasting on the horizon, it seems that this rule making is far in advance of the technology needed to demonstrate that it is even feasible. Further, I am concerned that it may not demonstrate prudent public policy.

In short, I would encourage you and the commission to place the issue of low power FM's on the back burner until the technical issues can be resolved as they apply to digital audio broadcasting. With our commitment to local programming which includes emergency weather information, news, public service programming and the like, any potential interference issues must be avoided to protect the well being of our communities.

Thank you for your consideration.

Sincerely,

J. Michael DeMarco  
Vice President & General Manager

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