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MM 99-25



Office of the Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

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Reference: MM Docket No. 99-25

I must speak out in opposition to "Low-Power FM" and the many dangers that it will create. Docket 80-90 added a great deal of interference and competition to the commercial radio spectrum. Now that the industry is finally recovering from that mistake, we must avoid an even bigger mistake today, Low Power FM /Micro Radio.

There are numerous pitfalls to the proposed plan. The greatest one appears to be the inability of the federal government to regulate the airwaves. Pirate radio is already a serious problem in this country. Cutbacks in budget limit the FCC in the ability to contact and shut down pirate stations. With thousands of low power stations added to the already crowded radio dial, it will be impossible to regulate the proper operation of these new stations. It will also be very difficult to identify and shut down pirate broadcasters because there are so many new low power stations across the dial. Pirate operators will be able to operate longer and with more power and interference hidden among thousands of new Micro Radio stations.

The other major concern I want to address is interference on the FM band. Reducing the protection offered existing stations could only mean one thing: more interference. Many FM receivers have a difficult time tuning between stations with the current spacing requirements. FM station only two channels apart operating in the same community will create serious interference problems. This will create dead zones within the protected contours of existing stations. Persons listening to FM who are very close to the new Micro Radio stations transmit location will have difficulty receiving the local station. This type of proposal would require a dramatic improvement in the technical specs of all FM receivers sold in this country. This would likely raise the price of FM radios making access to the radio more difficult. Eliminating the 2nd and 3rd adjacent channel separation criteria for the new classes of service would cause even more interference. This would seriously interfere with existing FM stations currently operating.

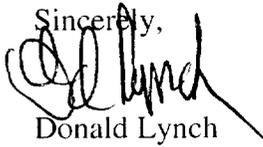
There is no guarantee that Low Power FM will increase minority and female ownership. Why will ownership of these new classes be any different than current commercial stations? The Commission's desire to license certain favored groups and the proposed ownership limits would have to be reconciled with Telecommunications Act of 1996 and the Balanced Budget Act of 1997. There are other avenues for individuals who want a voice in the community. The commission should investigate other means to offer interested parties access to existing broadcast stations. The Internet also offers anyone

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the opportunity to communicate his or her message not only to the community, but also to anywhere in the world.

Low Power FM is a bad idea. It won't succeed in achieving any of the objectives the FCC claims. It will cause problems for existing broadcasters with increased interference and much greater market fragmentation in the smaller markets. Many small market owners are still overcoming the increased competition from Docket 80-90. Limited advertising revenue makes it difficult to absorb the new stations in small markets. Larger markets will not receive new stations because of lack of spectrum availability. In small markets, those stations still trying to provide local news and community involved programming will be forced to cut out these services to lower operating expenses. This proposal must be stopped immediately.

Sincerely,

A handwritten signature in black ink, appearing to read "Donald Lynch", written over the word "Sincerely,".

Donald Lynch
General Manager
Sunburst Media
KYKX-FM, KFRO-AM/FM, KPXI-FM
Longview, Texas