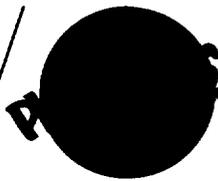




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OFFICE OF THE CHAIRMAN

Michael D. Fezzey
President / General Manager

July 26, 1999

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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. Chairman:

I am writing to address the issue of low power FM, or microradio, that the FCC has set forth in the January 28th Notice of Proposed Rulemaking. Although the intention of creating additional streams of public service is a noble one, it seems that this proposal is misguided.

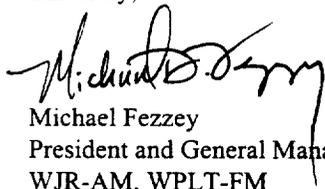
In order to add low power FM's in most major markets, second and third channel interference protections will have to be reduced. These protections make the already crowded FM band listenable. Where is the benefit in undermining the technical integrity of the FM band and generating significant interference? Also, elimination of the second and third adjacent channel interference protection will harm radio's transition to In-Band, On-Channel digital transmission.

It seems unlikely that low power FM will accomplish the FCC objective of increasing minority and female ownership. The FCC argues that such service will improve opportunities for diverse broadcast ownership. However, due to a lack of useable frequencies, few low power FM stations would be authorized in the largest urban markets with the most diverse populations.

Radio listeners depend on local broadcasters for local news, weather, entertainment, public affairs programming, and service to the community. Current ownership does an outstanding job of meeting the public's expectations.

I urge you and your fellow commissioners not to go forward with the implementation of low power FM's until interference issues can be properly addressed. We should not be putting access to existing high quality community programming at risk in order to bring on line a technically inferior product whose service to the community will be questionable at best.

Sincerely,


Michael Fezzey
President and General Manager
WJR-AM, WPLT-FM

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