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BROADCASTING
COMPANY

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WDJC-93.7 FM / WDJC-1260 AM ■ 2727 19th Place South ■ Homewood, AL 35209 ■ (205) 879-3324 ■ Fax (205) 802-4555

OFFICE OF THE CHAIRMAN

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

WMUZ- FM Radio 103.5
Detroit, MI

WLLZ-AM Radio 560
Detroit, MI

WEXL-AM Radio 1340
Detroit, MI

WYCA-FM Radio 92.3
Chicago, IL

WYBA-FM Radio 106.3
Chicago, IL

WYAA-FM Radio 102.3
Chicago, IL

KBRT-AM Radio 740
Los Angeles, CA

KCBC-AM Radio 770
San Francisco, CA

WDCX-FM Radio 99.5
Buffalo, NY

WDCZ-FM Radio 102.7
Rochester, NY

WDCZ-AM Radio 990
Rochester, NY

WDCD-FM Radio 96.7
Albany, NY

WDCD-AM Radio 1540
Albany, NY

WDCW-AM Radio 1390
Syracuse, NY

WDJC-FM Radio 93.7
Birmingham, AL

WDJC-AM Radio 1260
Birmingham, AL

KLZ-AM Radio 560
Denver, CO

KLTT-AM Radio 670
Denver, CO

KLDC-AM Radio 800
Denver, CO

KPBC-AM Radio 770
Dallas/Ft. Worth, TX

KSTL-AM Radio 690
St. Louis, MO

KJSL-AM Radio 630
St. Louis, MO

KKPZ-AM Radio 1330
Portland, OR

KLZL-AM Radio 1290
Portland, OR

KKJY-AM Radio 1640
Portland, OR

July 29, 1999

Chairman William Kennard
Federal Communications Commission
The Portals
445 12th Street South West
Washington, DC 20554

Dear Chairman Kennard:

I appreciate ingenuity in trying to better broadcasting and to have more minorities as owner/operators. However, if that ingenuity adds confusion and harm to the industry, where is the rationale?

Micro radio will create havoc and interfere on our local radio stations. Each area in America will be affected as this interference will be disruptive to community service, news, entertainment upon which listeners depend.

On the other side of the coin, you create a bias in that these low power frequencies are only for the minority. Sir, the playing field for broadcasting must be level and the true spirit of free enterprise must prevail.

Your desire to help minorities is appreciated, but this is a bad plan that is going to harm the entire industry.

Sincerely,

Larry Adcock
General Manager
WDJC-FM/AM

LA/kph

enclosure

cc: Don Crawford, Sr., President
Crawford Broadcasting Company

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Low Power FM: A Bad Deal for Full-Power Broadcasters

- **Low power FM will cause interference to existing stations.** In order to establish a low power service, the FCC would have to drastically alter its existing interference protection standards. The interference protection standards are in place to maintain the integrity of the spectrum. Elimination and/or alteration to the standards will result in increased interference to existing broadcaster's signals – and a loss of service to listeners.
- **Low Power FM will harm the development of In-Band, On-Channel (“IBOC”) digital radio.** The proponents of IBOC digital radio have been developing their systems based on the current interference protection standards. The systems utilize the “sidebands” of the analog signal to transmit the digital signal without the need for additional spectrum. Any alteration to the second-adjacent channel spacing restrictions could harm radio broadcasters in their transition to digital.
- **Low Power FM proposal will not achieve what the Commission wants.** Even if the Commission eliminates second and third adjacent channel protections, very few stations would be available in the urban markets. Serving urban communities and neighborhoods is a stated goal of the Commission in establishing this service. Clearly, it is folly to spend the resources to establish an entirely new service that ultimately is unable to serve the listeners for which it was intended. The Commission claims that it received over 13,000 requests for a low power station last year. Unfortunately, under this proposal – or any proposal – there will never be enough spectrum for even those persons to have their own station.
- **Low Power FM will not create viable stations to increase minority and female ownership.** Even if it is determined that a station is available in a particular area, there is no guarantee that minority and female owners will want and or actually receive a license – whether they are allocated on a first-come, first-serve basis or through an auction process. Furthermore, the economic viability of low power stations is questionable.
- **“Those who don’t know history are doomed to repeat it.”** In the 1980’s, the Commission began a proceeding that ultimately ended in the revision of its rules that allowed thousands of new stations on the air. The result of the infamous “Docket 80-90” was that there were too many stations in the marketplace. The Commission subsequently loosened radio ownership restrictions in order to bolster the industry. A culmination of this was the lifting of the national radio ownership restrictions and further loosening of the local restrictions in the Telecomm Act of 1996. Docket 80-90 was the direct cause of consolidation. The Commission should not travel down this path again.
- **Low Power FM will be an administrative nightmare for the FCC.** The Commission has limited resources. The Notice proposes to provide assistance to LPFM applicants – assistance unlike any ever provided to full-power applicants. Additionally, there is the increased regulatory and enforcement burden – not only for the newly licensed LPFM stations, but also for all of the unlicensed ‘pirate’ radio stations that refuse or are unable to obtain licenses and continue to broadcast. The Commission is proposing to place amateur stations in the middle of a mature service.
- **Low Power FM proposals for 1 – 10 watt stations are an inefficient use of the spectrum.** The Commission altered its rules in 1978 to prohibit further licensing of 10-watt “Class D” noncommercial educational stations because it determined the spectrum could be used more efficiently by larger stations that can reach more people. This premise remains true today.