

MM 99-25

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
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Creation of a Low)
Power Radio Service)
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MM Docket No. 99-25

RM-9208
RM-9242

Comments of
WOWI-FM, WSVY/WSVV-FM, WJCD-FM
CLEAR CHANNEL BROADCASTING, INC.

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Clear Channel Broadcasting, Inc.
WOWI-FM • WSVY/WSVW-FM • WJCD-FM

1003 Norfolk Square • Norfolk, VA 23502 • (757) 466-0009

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LOW POWER RADIO PROCEEDING - STATEMENT

I am Janet Armstead, Vice President and General Manager of Clear Channel Broadcasting, Inc. Norfolk properties WOWI-FM, Norfolk, VA; WSVY/WSVW-FM, Windsor, VA/Moyock, NC and WJCD-FM, Norfolk, VA.

WOWI-FM is a 50,000 kw, Class B station broadcasting on channel 275/frequency 102.9. WSVY-FM (simulcasts with WSVW-FM) is a 1.7 kw, Class A station broadcasting on channel 299/frequency 107.7 and WSVW-FM is a 14.5kw, Class C3 station broadcasting on channel 221/frequency 92.1. WJCD-FM is a 50,000 watt, Class B station broadcasting on channel 287/frequency 105.3.

The antenna HAAT for each station is as follows:

- WOWI-FM – 500 feet, nondirectional, Hours of operation – unlimited
- WSVY-FM – 620 feet, directional, Hours of operation – unlimited
- WSVW-FM – 410 feet, directional, Hours of operation - unlimited
- WJCD-FM – 500 feet, nondirectional, Hours of operation – unlimited

A significant area of listenership exists in each of our stations secondary service area, outside the protected service contour. Our main market service area is Norfolk, Portsmouth, Chesapeake, Virginia Beach, Hampton, and Newport News and our secondary service area is Williamsburg, Yorktown, Franklin, Courtland, Poquoson, Waverly, Elizabeth City, NC, and James City. With four of the top-rated broadcast stations, about 250,000 makes up our surrounding service area which is 1/6 of the market size. WOWI's target audience is 18-34 (50% Male, 50% Female) contour covers 32.4 miles radius of Norfolk, VA. WJCD's target audience is 25-54 (49.85% Male, 50.2% Female) and contour covers 32.4 miles radius of Norfolk, VA. WSVY/WSVW-FM's (simulcast) target audience is 25-49 (45% Male, 55% Female) with WSVY contour covering 15.03 miles radius of Windsor, VA and WSVW contour covers 24.25 miles radius of Moyock, N.C.

Difficulties in maintaining operations in current environment is as follows:

- 1) Too many stations in the marketplace already
- 2) As the diversity of the marketplace increases, so does our commitment to our service to the public.
- 3) Fulfilling obligations to reach each communities needs.

- 4) At present, our radio stations are committed to provide local news, sports, entertainment and public service programming. With the FCC's quest to be even "more diverse," this new proposal will interfere with existing broadcasters effort for locally based programming. This proposal will challenge the FCC to be the guardian of an even broader spectrum of stations.

Clear Channel Broadcasting stations reach a vast demographic audience of persons relying heavily upon WOWI/WSVY/WSVV/WJCD to be superlative in musical selections, news and information. These daily broadcasts have strong personal effects upon many listeners of the stations. I have found from listener responses recorded and via mail, that the public has a closeness with our stations that should not be ignored; and we in general, are public servants to the community and take pride in our responsibility for the role we play in so many lives.

From PSA's and Newscasts to Public Affairs Programs and Community Events, we have given our listeners the opportunity to help non-profit organizations by airing their messages and events over the air. We continue to provide our listeners with News and Public Affairs Programs such as "Pause For The Cause" focusing on the problems and concerns with today's youth, "On The Line" a program of significant importance to African Americans as it features community leaders addressing current community issues and concerns. The "Question of the Day" deals with local and national subject matter where the audience airs their views and opinions. "Hampton Roads Minute" recognizes individuals in the community that have made a difference in Hampton Roads, and "Hampton Roads Weekend Magazine" featuring an array of public service officials from different organizations, institutions and businesses.

We continue to build a strong foundation in the community by encouraging our audience not just to be a listener (behind the scenes) but to take an active part in our quest to build a better community. Through public support and a great staff, we continue the search for excellence.

Hampton Roads is already per capita one of the most saturated and fragmented Radio Markets in the country. With (31) reported stations in the Arbitron and another four or five penetrating some part of the metro, the advertiser and public alike have had many choices for music, entertainment, public service information and a more than competitive advertising environment. I can not think of one reason how Low Power Radio Licenses could add anything to an already saturated Radio market.

Our argument for added Radio licenses could be that the market is growing; however, in the last 2 weeks, Hampton Roads has gone from 33 of the largest Markets down to our current ranking of 36th. Again, what benefit to the public would be served by passing the LPFM Proposal? From a revenue stand point, this year is the first year Hampton Roads Radio Revenue shows signs of significant growth in the past four years.

In addition to the above, this increased opportunity is strictly for those individuals who are not currently broadcast owners. While the idea in itself is admirable and not taking away from diversity in ownership; this gesture of goodwill will end up cluttering the airwaves for those listeners who depend on "quality broadcasting." Opportunity is great. However, when you offer something that can diminish the very core of why broadcasting started in the beginning; which is to accurately serve the community; it seems ironic to institute a service that will not benefit its consumer but only give recognition to its owner. Low power radio speaks for itself . . . "LOW POWER." Why offer something that will cause confusion for its listeners while in the meantime crossing over into quality frequencies offered by other established stations. Interference protection for other stations is critical and is a major concern for all broadcasters and this proposal will inevitably put an end to the existence of quality broadcasting as we know it today.



Janet Armstead
Vice President/General Manager

6-22-99

Date

cc: Mark Mays, President/COO
George Sosson, Senior Vice President/East Region