

ORIGINAL

MM 99-25

**Oldies  
104.3  
WOMC**

March 22, 1999

EX PARTE OR LATE FILED

The Honorable William Kennard  
Chairman  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

RECEIVED

NOV 01 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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MAR 24 1 28 PM '99

Dear Mr. Chairman:

I am writing to express my concerns about the issue of low-power FM.

I am concerned about the interference for existing stations. The interference protection standards were put in place to maintain the integrity of the spectrum. Adding low-power stations can only penalize those stations that have been up and running for years.

I appreciate the interest that many people have in becoming broadcasters. It is my understanding that there are still AM and FM licenses available for application. Why would the commission add low-power FMs while applications for these AM and FM licenses are pending?

I would urge you and the commissioners to put on hold action that would result in adding low-power FMs. Our listeners depend on us for local news, weather, traffic and emergency bulletins. Why put that free access in jeopardy and give pirate radio operators the freedom to interfere with longer term broadcast operations.

Thank you.

Sincerely,



Elaine R. Baker  
Vice President and  
General Manager

No. of Copies rec'd 0+1  
List ABCDE

© CBS RADIO

ORIGINAL

MM 99-25



EX PARTE OR LATE FILED SCHOOL OF COMMUNICATIONS OFFICE OF THE DEAN

June 8, 1999

RECEIVED

NOV 01 1999

FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

The Honorable William Kennard  
Chairman  
Federal Communications Commission  
445 12th St. SW  
Washington, DC 20554

RE: MM Docket No. 99-25

Dear Mr. Chairman:

Attached is a petition signed by 184 faculty, administrators, staff and students of Webster University in support of establishment of a Low Power FM Radio service. Like approximately 140 other colleges and universities, Webster University operates a radio station that could benefit from a Low Power FM license. We encourage the FCC to move with this very important proceeding.

Sincerely,

*Debra A. Carpenter*

Debra A. Carpenter  
Dean  
School of Communications

- cc: Commissioner Ness
- Commissioner Powell
- Commissioner Furchgott-Roth
- Commissioner Tristani
- Dr. Richard Meyers, President
- Dr. Neil George, Executive Vice President and Vice President of Academic Affairs



DEBRA A. CARPENTER  
Dean  
School of Communications

470 East Lockwood Avenue  
Saint Louis, MO 63119-3194  
Phone: 314-968-7147  
Fax: 314-963-6106  
e-mail: carpenda@webster.edu  
internet: www.webster.edu

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North Carolina • Oklahoma • South Carolina • Texas • Washington, D.C.

# Webster University students for low power FM radio station availability on college campuses

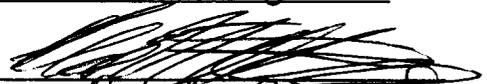
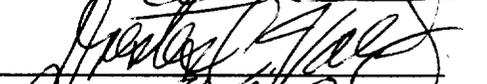
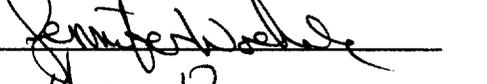
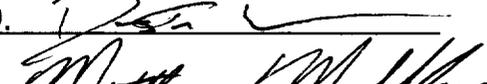
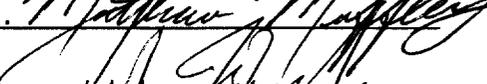
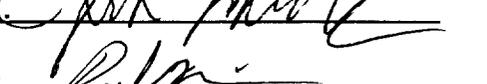
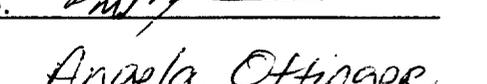
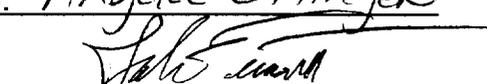
We the students at Webster University in St. Louis urge Chairman Kennard of the FCC to consider making available low-power FM station opportunities as soon as possible.

<u>Printed Name</u>	<u>Same student's signature</u>
1. Shanara G. Schweizer	1. Shanara G. Schweizer
2. MARCELINA DA SILVA	2. Marcelina da Silva
3. Christine R. Crawford	3. Christine R. Crawford
4. Jill Luscei	4. J. Luscei
5. MIA PIERRE	5. Mia Pierre
6. Liu, Chia-Chang	6. Chia Chang Liu
7. Harold R. Blackaby III	7. H. R. Blackaby III
8. Jane M. ...	8. Jane M. ...
9. DIANE HANZEN	9. Diane Hanzen
10. Shannon ...	10. Shannon ...
11. Jonathan Fyfe	11. Jonathan Fyfe
12. Emily Biver	12. Emily Biver
13. Catherine Mennes	13. Catherine Mennes
14. Joe Haistop	14. Joe Haistop
15. Lindsey Loxe	15. Lindsey Loxe

**Students: Please return petition to Debra Carpenter, west lobby of the Sverdrup building, by Friday April 23.**

## Webster University students for low power FM radio station availability on college campuses

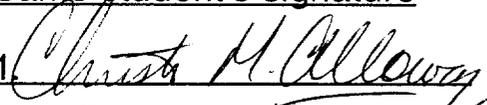
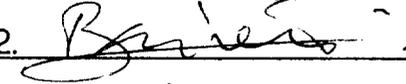
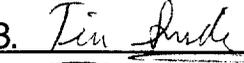
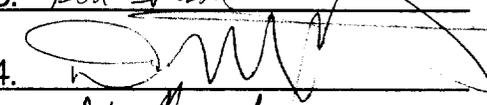
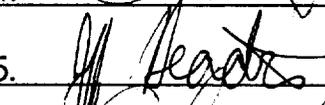
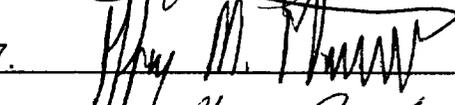
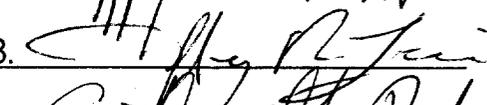
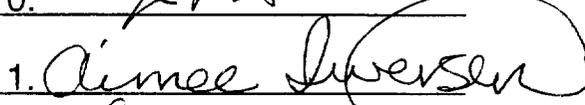
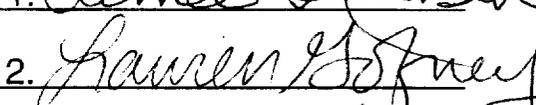
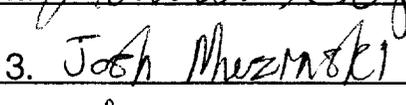
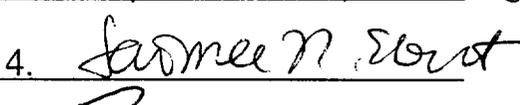
We the students at Webster University in St. Louis urge Chairman Kennard of the FCC to consider making available low-power FM station opportunities as soon as possible.

Printed Name	Same student's signature
1. Paul Nadjimabadi	1. 
2. Orestes VALDES	2. 
3. Corinne Srebada	3. 
4. Rachel Best	4. 
5. Paul Simon	5. 
6. Jefferson Blackburn	6. 
7. Jennifer Wachter	7. 
8. Gina Brenon	8. 
9. Anthony Beard	9. 
10. Dustin Welborn	10. 
11. Matthew Muffley	11. 
12. John Deckelre	12. 
13. Paul Kern	13. 
14. Angela Ottinger	14. 
15. John Sennett	15. 

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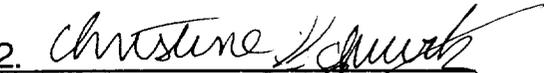
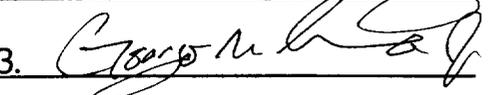
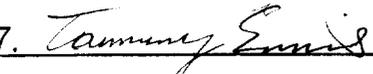
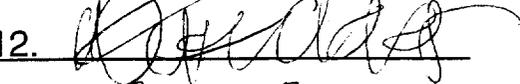
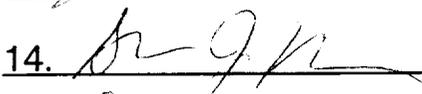
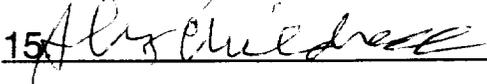
We the students at Webster University in St. Louis urge Chairman Kennard of the FCC to consider making available low-power FM station opportunities as soon as possible.

Printed Name	Same student's signature
1. Christine Alloway	1. 
2. ERWAN BOIVENT	2. 
3. Tim Smider	3. 
4. <del>Ben Mc</del>	4. 
5. Jeffrey Headrick	5. 
6. Chris Carley	6. 
7. Jeff O'Donnell	7. 
8. <del>Jeff Lewis</del>	8. 
9. Erika Ritzel	9. 
10. Stefan Hester	10. 
11. Aimee Iwersen	11. 
12. <del>Lauren Gofney</del>	12. 
13. <del>Josh Muzinski</del>	13. 
14. Jaimee N. Ebert	14. 
15. Ben Wiven	15. 

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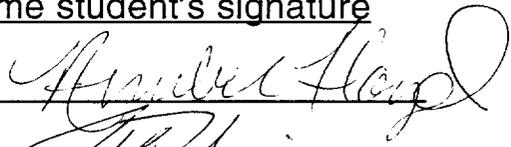
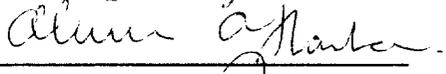
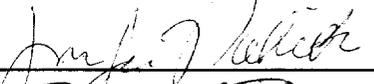
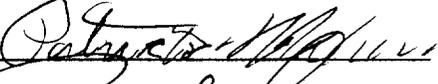
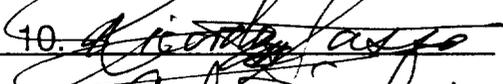
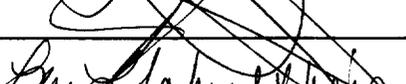
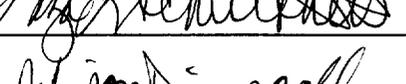
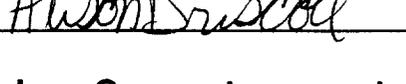
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<u>Printed Name</u>	<u>Same student's signature</u>
1. Nicholas Anacleto	1. 
2. Christine Schmitt	2. 
3. George Cannon	3. 
4. Kirsten de Boer	4. Kirsten de Boer
5. Kimberly Wingard	5. 
6. Jennifer A. Tucker	6. Jennifer Tucker
7. Tammy Ennis	7. 
8. Pamela Reynolds	8. 
9. Rebecca Howell	9. Rebecca Howell
10. Alexis D. Colman	10. 
11. Aaron Story	11. 
12. Dustin Adair	12. 
13. Jesse M. Parzer	13. Jesse Parzer
14. 	14. Shawn Roberts
15. 	15. Alex Childress

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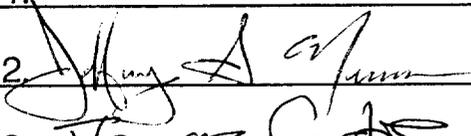
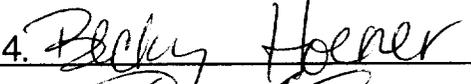
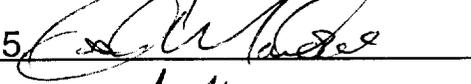
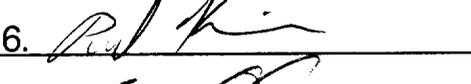
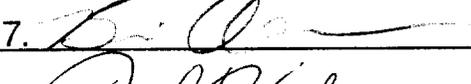
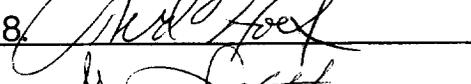
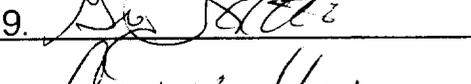
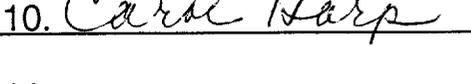
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<u>Printed Name</u>	<u>Same student's signature</u>
1. Amber Floyd	1. 
2. JEFF TOBIN	2. 
3. Plesch Mayo	3. 
4. Oliver O'Hanlon	4. 
5. Jennifer Nahlik	5. 
6. Tim Schmitt	6. 
7. Jennifer L Gaskin	7. 
8.	8.
9. Patrick Maher	9. 
10. RICARDO SASSO	10. 
11. Julian Bickford	11. 
12. EWA LASOFA	12. 
13. Jamah Bussey	13. 
14. Liza Lschultzeis	14. 
15. Alison Driscoll	15. 

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<u>Printed Name</u>	<u>Same student's signature</u>
1.	1.
2. Jeff Nunn	2. 
3. Tom Curtis	3. 
4. Becky Hoener	4. 
5. Josh Marlowe	5. 
6. Paul Keim	6. 
7. BRIAN O'CONNOR	7. 
8. Ted Hoef	8. 
9. GREGORY LITTLE	9. 
10. CAROL HARPER	10. 
11.	11.
12.	12.
13.	13.
14.	14.
15.	15.

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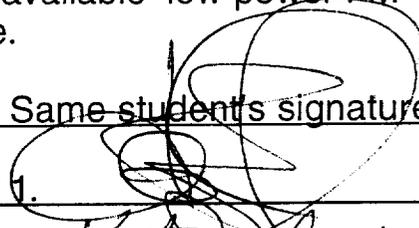
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Printed Name

Same student's signature

1. Joseph M. Blunstein

1. 

2. KATHY CONLEY

2. 

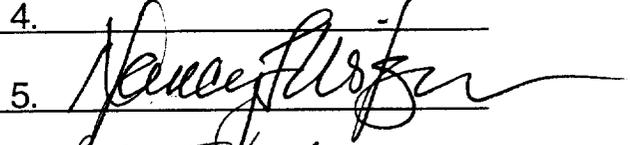
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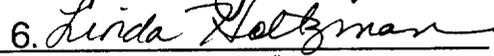
4.

4.

5. NANCY F. WILSON

5. 

6. LINDA HOLTZMAN

6. 

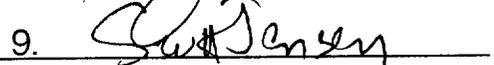
7. BARB FINAN

7. 

8. KIT JENKINS (KATHERINE)

8. 

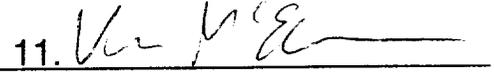
9. SWATT JENSEN

9. 

10. Art Silberblatt

10. 

11. Van McElwee

11. 

12.

12.

13. Malaiika Home

13. 

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<u>Printed Name</u>	<u>Same student's signature</u>
1. Cheryl Lynn Scheck	1. Cheryl Lynn Scheck
2.	2.
3.	3.
4.	4.
5.	5.
6.	6.
7.	7.
8.	8.
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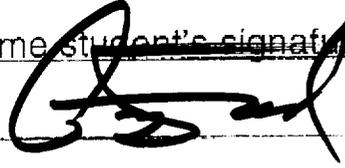
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Printed Name

Same student's signature

1. GARY FORD

1. 

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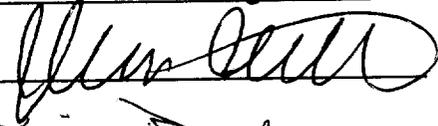
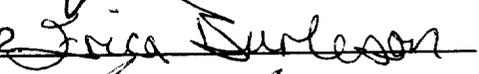
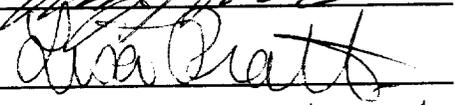
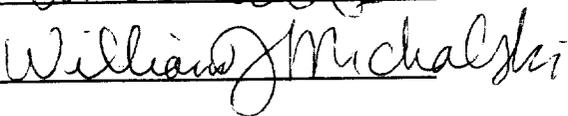
15.

15.

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<u>Printed Name</u>	<u>Same student's signature</u>
1. BARNEY Smith	1. 
2. Erica Burleson	2. 
3. Kerry Hayes- RHA	3. 
4. Lisa Pratt	4. 
5. Bill Michalski	5. 
6.	6.
7.	7.
8.	8.
9.	9.
10.	10.
11.	11.
12.	12.
13.	13.
14.	14.
15.	15.

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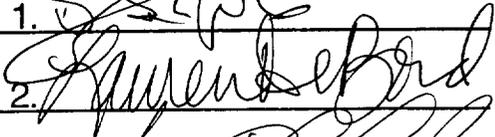
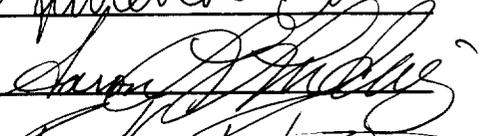
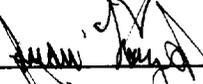
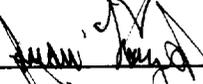
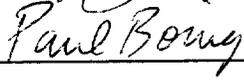
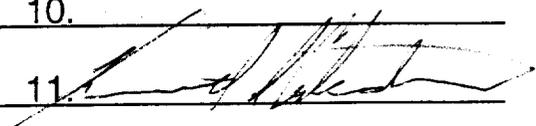
We the students at Webster University in St. Louis urge Chairman Kennard of the FCC to consider making available low-power FM station opportunities as soon as possible.

<u>Printed Name</u>	<u>Same student's signature</u>
1. Elizabeth S. DuHacic	1. Elizabeth J. DuHacic
2. Colleen Carter	2. Colleen Carter
3. Jessica Wolf	3. Jessica Wolf
4. Mary Beth Mascall	4. Mary Beth Mascall
5. Amy Schultz	5. Amy Schultz
6. Tyson Schaffner	6. Tyson Schaffner
7. Matt Kleinberg	7. Matt Kleinberg
8. Tim Hook	8. Tim Hook
9. Ryan Hendrickson	9. Ryan Hendrickson
10. Natasha Jacobsen	10. Natasha Jacobsen
11. Catharine O'Toole	11. Catharine A. O'Toole
12. Daniel Ballesteros	12. Daniel Ballesteros
13. Laura Stuhlman	13. Laura Stuhlman
14. Colleen Kraft	14. Colleen Kraft
15. <del>John</del> Charles Rabe	15. Charles Rabe

**Students: Please return petition to Debra Carpenter, west lobby of the Sverdrup building, by Friday April 23.**

# Webster University students for low power FM radio station availability on college campuses

We the students at Webster University in St. Louis urge Chairman Kennard of the FCC to consider making available low-power FM station opportunities as soon as possible.

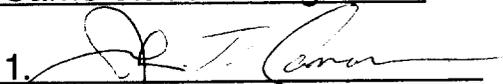
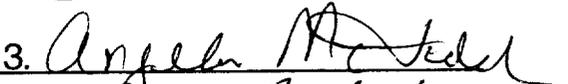
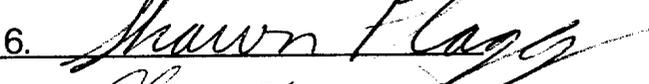
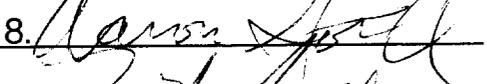
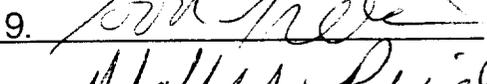
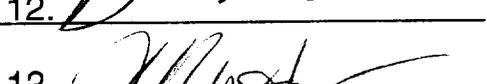
<u>Printed Name</u>	<u>Same student's signature</u>
1. Blake Nelson	1. 
2. Lauren DeBord	2. 
3. Aaron Ludwig	3. 
4. <del>Ronald C. Kys</del>	4. <del></del>
5. Amber Williams	5. 
6. <del>Scott Boyce</del>	6. <del></del>
7. <del>Paul Boing</del>	7. <del></del>
8. SCOTT BOYCE	8. 
9. Paul Boing	9. 
10.	10.
11. Ken Calcaterra	11. 
12.	12.
13.	13.
14.	14.
15.	15.

Carpenter

**Students: Please return petition to Debra Carpenter, west lobby of the Sverdrup building, by Friday April 23.**

## Webster University students for low power FM radio station availability on college campuses

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Printed Name	Same student's signature
1. John CANAVERA	1. 
2. Phillip Weaver	2. 
3. Angela McFadden	3. 
4. <del>_____</del> Cindy Goodard	4. 
5. James Rea	5. 
6. Shawn Flagg	6. 
7. CHRIS McMillan	7. 
8. AARON GOLD	8. 
9. Todd Green	9. 
10. MOLLY Rerd	10. 
11. Anthony Weidler	11. 
12. David PAUL	12. 
13. Jessica Rudy	13. 
14. _____	14. _____
15. _____	15. _____

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## Webster University students for low power FM radio station availability on college campuses

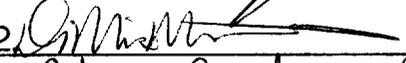
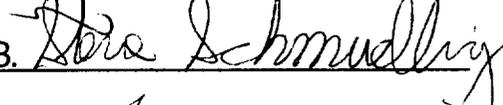
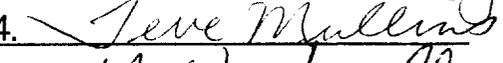
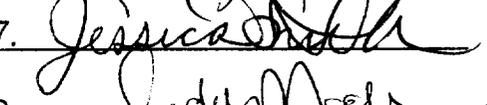
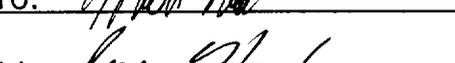
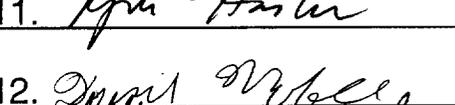
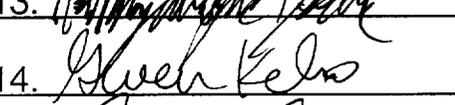
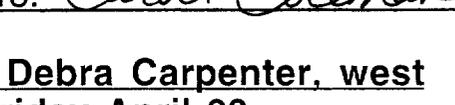
We the students at Webster University in St. Louis urge Chairman Kennard of the FCC to consider making available low-power FM station opportunities as soon as possible.

Printed Name	Same student's signature
1. MELVIN WALTERS	1. Melvin Walters
2. NANCY BORDWICK	2. Nancy Bordewick
3. Janise Wakefield	3. Janise Wakefield
4. Natalie LeGrand	4. Natalie LeGrand
5. John Michael BETZ	5. John M. Betz
6. Leigh Muzzslay	6. Leigh Muzzslay
7. SOPHIA SCHWERTZ	7. Sophia Schwartz
8. Julie Hunt (Julie Hunt)	8. Julie Hunt
9. Michael Whitmer	9. Michael Whitmer
10. TRAVIS NORVELL	10. Travis Norvell
11. Jennifer Stanza	11. Jennifer Stanza
12. Autumn Calabrese	12. Autumn Calabrese
13. RACHEL DEICAU	13. Rachel Deicau
14. ROBERT ROSSFELD	14. Robert Rossfeld
15. Jeff Stobey	15. Jeff Stobey

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## Webster University students for low power FM radio station availability on college campuses

We the students at Webster University in St. Louis urge Chairman Kennard of the FCC to consider making available low-power FM station opportunities as soon as possible.

<u>Printed Name</u>	<u>Same student's signature</u>
1. STEVE MEYER	1. 
2. DiMinda Hampton	2. 
3. Steve Schmudlitz	3. 
4. TERE MULLINS	4. 
5. John Vandusall	5. 
6. Lindsey Jucker	6. 
7. Jessica Smith	7. 
8. Jody Mook	8. 
9. Charlie Eisenbath	9. 
10. Matt Reed	10. 
11. Ryan HANLON	11. 
12. DAVID NOBLS	12. 
13. Anthony Wayne Beard	13. 
14. Owen Kelso	14. 
15. Carolee Coleman	15. 

**Students: Please return petition to Debra Carpenter, west lobby of the Sverdrup building, by Friday April 23.**

# Webster University students for low power FM radio station availability on college campuses

We the students at Webster University in St. Louis urge Chairman Kennard of the FCC to consider making available low-power FM station opportunities as soon as possible.

Printed Name	Same student's signature
1. Kristen Guskovick	1. Kristen L. Guskovick
2. <del>Jeff</del> A Blandford J	2. <del>Jeff</del> A Blandford J
3. Nick Otter	3. Nick Otter
4. <del>Maarten</del> Maarten de Bee	4. <del>Maarten</del> Maarten de Bee
5. Barbara Sladky	5. Barbara Sladky
6. Brian Gullage	6. Brian Gullage
7. Emily Beener	7. Emily Beener
8. Aimee Dyer	8. Aimee Dyer
9. Katie King	9. Katie King
10. BARRY JOHNSTON	10. Barry Johnston
11. Eileen Solomon	11. Eileen Solomon
12.	12.
13.	13.
14.	14.
15.	15.

**Students:** Please return petition to Debra Carpenter, west lobby of the Sverdrup building, by Friday April 23.

# CRISTO VIENE PRONTO, ACEPTALO EN TU CORAZON, AHORA Y SALVATE

CARMITA RODRIGUEZ - MINISTRO DE DIOS

Calle Derkes 6-E (Frente Plaza)  
Apartado 344  
Guayama, Puerto Rico 00785  
Tel. 864-3658  
Fax: (787) 864-6780

JUNTA EJECUTIVA:  
•Hna. Carmita Rodriguez  
Presidenta  
•Eugene Rodriguez  
1er Vice-Presidente  
•Esteban Bermúdez  
2do Vice-Presidente  
•Carmen Rodriguez  
Secretaria - Tesorera  
Y ANTE TODOS, PADRE,  
HIJO Y ESPIRITU SANTO.



March 4, 1999

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NOV 01 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

The Honorable William E. Kennard  
Chairman  
Federal Communications Commission  
445 12th Street, S.W.  
Room 8-B210  
Washington, DC 20554

Dear Chairman Kennard:

I am writing in opposition to the creation of a new low power FM radio service as proposed in the Commission's Notice of Proposed Rule Making ("NPRM"), released February 3, 1999. I am a radio broadcaster on the island of Puerto Rico. Puerto Rico possesses a number of unique factors which make it ill-suited to the expansion of the FM band. Puerto Rico, therefore, should be excluded from whatever rulemaking the Commission undertakes with regard to low power FM radio.

The island of Puerto Rico is a relatively small land area, less than 100 miles long and roughly 35 miles wide, that is currently saturated with AM and FM broadcast stations. Compared to the United States, Puerto Rico is made up of a mere 3,427 square miles, less than one tenth of one percent of the land area of the United States, a land area slightly larger than the State of Delaware. Nonetheless, despite its relatively small size, Puerto Rico has roughly 120 licensed radio stations. By comparison, Delaware has a mere 28 radio stations for an area roughly similar in size.

Puerto Rico has a unique topography. It is a small island with a large mountain range dividing the island from east to west. As a result, a disproportionately large number of radio stations have been licensed in Puerto Rico, many of which are licensed to small communities. Currently, all communities in Puerto Rico are well served by the existing AM and FM stations.

Another factor which makes Puerto Rico ill-suited to the newly proposed class of FM stations is the fact that the island has been designated by the FCC as a "coordination zone," designed to protect the Arecibo Radio Astronomy Observatory near Arecibo, Puerto Rico from

"De modo que si alguno está en CRISTO, Nueva Criatura Es; las cosas viejas pasaron; he aquí todas son hechas nuevas"  
(Pablo, 2da de Corintios 5:17)

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OFFICE OF THE SECRETARY

radio interference.<sup>1</sup> In its *Report and Order*, the Commission stated that "the Observatory is a unique scientific tool, and ... harmful interference to the Observatory's operations is a serious concern."<sup>2</sup> As a coordination zone, all broadcasters on the island are currently required to coordinate license modifications with the Observatory. Thus, to add the new class of stations to the island would not only add to the congestion of the radio frequencies, but also increase the likelihood of interference to the Observatory. Given the priority the Commission has placed on protecting the Observatory from interference, it would be inconsistent with the *Report and Order* to flood the Puerto Rican airwaves with even more radio stations.

In sum, such service would not benefit the residents of Puerto Rico, where a great number of radio stations adequately serve the public, and the broadcast spectrum is already crowded. As such, Puerto Rico would be better served without microradio broadcasting to further clutter the airwaves and it should be excluded from any rulemaking that the Commission undertakes in this matter.

Respectfully submitted:

Date: \_\_\_\_\_

8/15/99

Laura R. de Rodriguez

A:\Lowpowfm.doc

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<sup>1</sup> *Amendment of the Commission's Rules to Establish a Radio Astronomy Coordination Zone in Puerto Rico, Report and Order*, ET Docket No. 96-2, RM-8165, October 15, 1997.

<sup>2</sup> *Id.* at 5.



# ORIGINAL WOPP RECEIVED

1101 Cameron Road  
Opp, AL 36467-2407

Phone  
1-334-493-4545  
Fax  
1-334-493-4546  
E-mail  
wopp@wopp.com

MMB

OFFICE OF THE CHAIRMAN

July 15, 1999

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*MM 99-25*

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

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Dear Chairman Kennard,

The purpose of this letter is to express my concern of the FCC commitment to low power radio. The FCC 80-90 Docket was a mistake. The ownership deregulation also was a mistake. The Commission has done nothing to help small town radio. Those of us who have invested large amounts of money and our lives into our community.

EMS was a mistake with the Trademark issue still not settled. But, it looks like we all will be paying for the FCC's mistake. Most of us very small market stations don't have the extra money to cover these expenses and keep employees working. The old EBS system use to work fine. Especially in states like Alabama where our Broadcasters Association had taken charge.

The Low Power issue is simple if the FCC would go back to 1978 to the 10 watt non-commercial educational stations and issue them to anyone not interfering with a commercial station. The Commission needs to remember the small town radio stations that give the public news, opinions, weather, local sports, yes, and even birthday and funeral announcements.

WOPP is a full-time commercial broadcast station with a 4 tower daytime, 3 tower nighttime directional array. Operating at 2.5Kw day and 500 watts night. The system is expensive to operate and upkeep but the FCC 80-90 Docket gave us no consideration in the opportunity of getting a 3,000 watt FM. The daytime only AM stations were and many did, then signing off their AM and forgetting local events. Was this in the best interest of their community?

We also ask that you consider the music licensing companies that are choking our industry. (ASCAP, BMI & SESAC) They get their raise each year even if we can't raise our rates. It seems they've never considered that if we didn't play their music they would have no one to hear it and want to buy it.

Please vote NO on low power FM. Please look into the music licensing. Please consider a way of helping very small market, small town full time AM stations. Please reconsider the ownership guidelines. Please listen to a small town USA radio station owner and manager. I will be more that happy to discuss our problems eye to eye.

Sincerely,

*Robert H. Boothe Jr.*  
Robert H. Boothe Jr.,  
G. M. WOPP Radio



**WOPP**  
**1290 AM Stereo**



Phones:  
(800) 3323  
(334) 4545  
Fax:  
(334)493-4546



Address:  
1101 Cameron Road  
Opp, AL 36467

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**Robert H. Boothe, Jr., G. M.**

MM

MM 99-25

ORIGINAL

TURABO RADIO CORPORATION

P.O. BOX 487 - CAGUAS, PUERTO RICO 00726-0487 - TEL. 744-3131  
P.O. BOX 5725 - SAN JUAN, PUERTO RICO 00906



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NOV 01 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

March 10, 1999

Mr. William E. Kennard  
Chairman  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Dear Chairman Kennard:

I am writing in opposition to the creation of a new low power FM radio service as proposed in the Commission's Notice of Proposed Rule Making ("NPRM"), released February 3, 1999. I am a radio broadcaster on the island of Puerto Rico. Puerto Rico possesses a number of unique factors which make it ill-suited to the expansion of the FM band. Puerto Rico, therefore, should be excluded from whatever rulemaking the Commission undertakes with regard to low power FM radio.

The island of Puerto Rico is a relatively small land area, less than 100 miles long and roughly 35 miles wide, that is currently saturated with AM and FM broadcast stations. Compared to the United States, Puerto Rico is made up of a mere 3,427 square miles, less than one tenth of one percent of the land area of the United States, a land area slightly larger than the licensed radio stations. By comparison, Delaware has a mere 28 radio stations for an area roughly similar in size.

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Another factor which makes Puerto Rico ill-suited to the newly proposed class of FM stations, is the fact that the island has been designated by the FCC as a "coordination zone", designed to protect the Arecibo Astronomy Observatory near Arecibo, Puerto Rico, from radio interference.<sup>1</sup> In its *Report and Order*, the Commission stated that "the Observatory is a unique scientific tool, and... harmful interference to the Observatory's operations is a serious concern."<sup>2</sup> As a coordination zone, all broadcasters on the island are currently required to coordinate license modifications with the Observatory. Given the priority the Commission has placed on protecting the Observatory from interference, it would be inconsistent with the *Report and Order* to flood the Puerto Rican airwaves with even more radio stations.

In sum, such service would not benefit the residents of Puerto Rico, where a great number of radio stations adequately serve the public, and the broadcast spectrum is already crowded. As such, Puerto Rico would be better served without microradio broadcasting to further clutter the airwaves and it should be excluded from any rulemaking that the Commission undertakes in this matter.

Respectfully submitted:

  
\_\_\_\_\_  
Jesus M. Soto, C.E.O.

Date: 3-12-99

<sup>1</sup>Amendment of the Commission's Rules to Establish a Radio Astronomy Coordination Zone in Puerto Rico, *Report and Order*, ET Docket No. 96-2, RM-8165, October 15, 1997.

<sup>2</sup>*Id.* at 5.

**WNEL-AM-CAGUAS**

... 1430 KHZ 5,000 Watts

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July 28, 1999

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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Chairman  
Federal Communications Commission  
445 12th. Street, S.W.  
Room 8-B210  
Washington, DC 20554

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<sup>1</sup> Amendment of the Commission's Rules to Establish a Radio Astronomy Coordination Zone in Puerto Rico, Report and Order, ET Docket No. 96-2, RM-8165, October 15, 1997.  
<sup>2</sup> *Id.* At 5.

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The Honorable William E. Kennard  
Chairman  
Federal Communications Commission  
July 28, 1999  
Page #2

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Respectfully submitted;

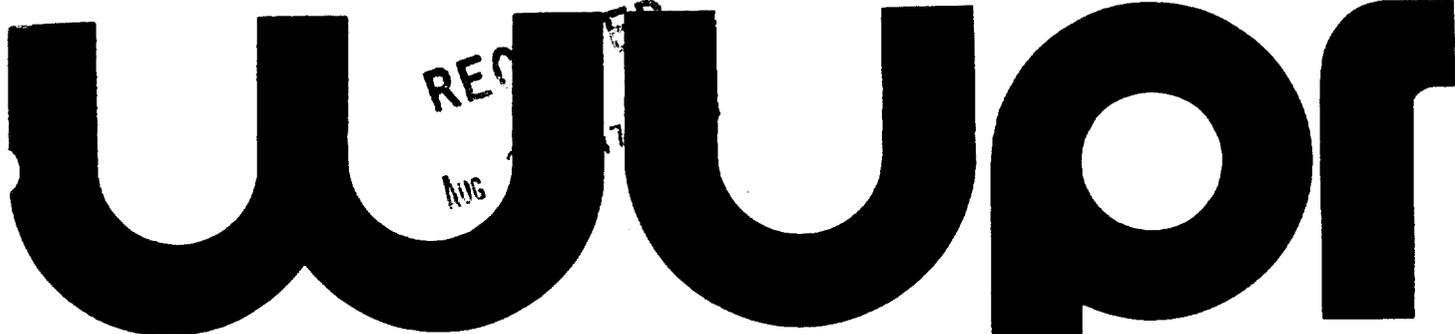
  
Efrain Archilla-Diez  
President



ORIGINAL

MM 99-25

WLD



**CENTRAL BROADCASTING CORPORATION**  
p.o. box 868, utuado, puerto rico 00761 / teléfonos 894-2460, 894-1530

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July 28, 1999

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

The Honorable William E. Kennard  
Chairman  
Federal Communications Commission  
445 12<sup>th</sup> Street, S. W.  
Room 8-B210  
Washington, DC 20554

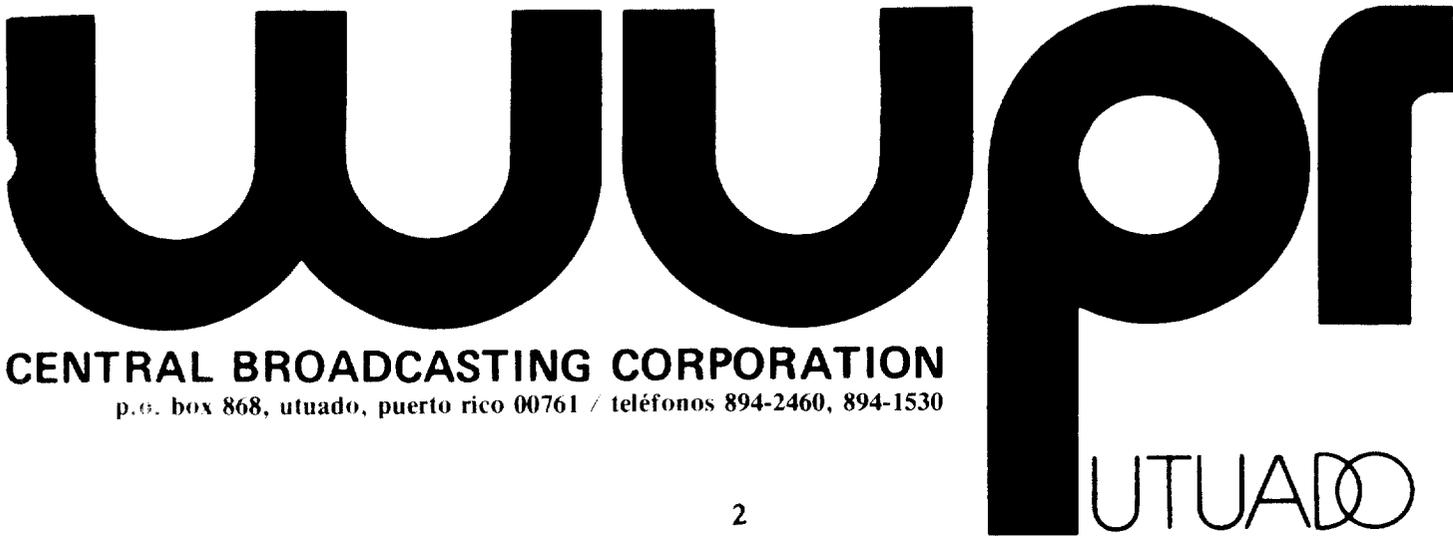
Dear Chairman Kennard:

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**CENTRAL BROADCASTING CORPORATION**

p.o. box 868, utuado, puerto rico 00761 / teléfonos 894-2460, 894-1530

Another factor which makes Puerto Rico ill-suited the newly proposed class of FM stations is the fact that the island has been designated by the FCC as a "condition zone," designed to protect the Arecibo Radio Astronomy Observatory near Arecibo, Puerto Rico from radio interference.<sup>1</sup> In its Report and Order, the Commission stated that "the Observatory is a unique scientific too, and ... harmful interference to the Observatory's operations is a serious concern."<sup>2</sup> As a coordination zone, all broadcasters on the island are currently required to the island would not only add to the congestion of the radio frequencies, but also increase the likelihood of interference to the Observatory. Given the priority the Commission has placed on protecting the Obeservatory from interference, it would be inconsistent with the *Report and Order* to flood the Puerto Rican airwaves with even more radio stations.

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Respectfully submitted:

José A. Martínez  
Vice-President  
General Manager

Date: JULY. 28, 1999

A:\Lowpowfin.doc

<sup>1</sup> *Amendment of the Commission's Rules to Establish a Radio Astronomy Coordination Zone in Puerto Rico, Report and Order, ET Docket No. 96-2, RM-8165, October 15, 1997.*

<sup>2</sup> *Id.* At 5.

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Fruit Broadcasting, LLC

~~WRCO-AM/FM Radio~~

2111 Bohmann Drive, PO Box 529  
Richland Center WI 53581

Telephone: 608-647-2111 Facsimile: 608-647-8025

e-mail: wrco@mwt.net web: www.wrco.com

JUL 2 12 25 PM '99

OFFICE OF THE CHAIRMAN

June 29, 1999

The Honorable William Kennard, Chairman  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

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NOV 01 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Dear Mr. Chairman:

This letter is being sent to register my concerns with low power FM. It is very discouraging for myself as a small station owner to think that the battles we currently face to serve our listeners will only be more of a challenge thanks to low power FM.

I have to respond to listeners on an all to regular basis as to why our signal is not readily available to all residents in our county. We are a Class A FM with 6,000 watts in the hills of southwest Wisconsin. We have tried hard to be a good community servant, but we are limited by our signal coverage. It seems unfair to risk interference to our signal with low power FM when we are already struggling to reach listeners that need us.

I applaud the Commission for its efforts to enforce rules regarding unlicensed pirates. I am left to wonder given the Commission's strained resources, how pirate enforcement can continue with the added burden of low power enforcement? Will adequate enforcement be possible or feasible? Will pirate stations benefit?

It is also my understanding that low power FM will harm the development of In-Band, On-Channel digital radio. As such, low power FM should be dealt another blow.

I believe in radio and its ability to be a powerful force for community good. Low power FM threatens that public service. I don't believe that low power FM will be viable as a public servant nor do I think such low power stations will be economically feasible. As we work hard to make ends meet, low power FM presents one more challenge. If we fail, who will win? Certainly not the people we have served for the last 50 years. As such, I would strongly encourage you and the Commission to put low power FM on hold unless such issues can be resolved.

Sincerely,

*Rm Fruit*

Ron Fruit  
Owner/General Manager  
Fruit Broadcasting, LLC

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## **Webster University students for low power FM radio station availability on college campuses**

Whereby the cost of acquiring a radio license has increased to a level that it is prohibitive for most universities, colleges and high schools who wish to have a campus radio station; and

Whereby the Federal Communications Commission has proposed opening the nation's airwaves at a low, affordable cost to small, low-power FM radio stations that could include those at schools of higher education; and

Whereby these low-power FM stations would increase campus radio stations' ability to reach their local communities and audiences, nearby student housing and dorms; and

Whereby making these airwaves available would increase the number of voices and radio formats available to local communities and accomplish the FCC's original charge of managing the airwaves in a way that assures community and local programming; and

And whereby we students represent the future audiences and broadcasters of America and need the opportunity to broadcast now in an educational setting to learn the business;

We students at Webster University in St. Louis urge Chairman Kennard of the FCC to consider making available these low-power FM opportunities as soon as possible.

**Students: Please return the attached signed petition to  
Debra Carpenter, office in the west lobby of the Sverdrup  
building, by Friday, April 23.**

470 EAST LOCKWOOD AVENUE • SAINT LOUIS, MO 63119-3194 • USA • 314-968-7147 • FAX 314-963-6106

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