

WRFD

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

October 14, 1999

The Honorable William Kennard
Chairman, Federal Communications Commission
The Portals
445 12th Street, Southwest
Washington, D.C. 20554

Dear Mr. Chairman:

As you and your fellow commissioners review the comments in response to your Notice of Proposed Rulemaking on low-power FM (LPFM), I would like to submit that some of the objectives you seek to achieve through LPFM may be possible through the review and restructuring of some current broadcast signals.

I understand that one of the reasons LPFM is being considered is to provide more opportunities for minority organizations to broadcast their message(s) to their local community. What I don't fully understand is why the commission is eager to bring more signals into an already crowded broadcast community while at the same time denying current broadcasters the opportunity to meet those needs?

Several decades ago the use of clear channel frequencies made sense. With more than 12,000 radio stations in America today the clear channel frequencies actually limit the amount of "local" programming opportunities. To "protect" the clear channel signals from hundreds of miles away, dozens of radio stations across America that must cease their broadcasting at night. Other stations must broadcast at such low power levels that they cannot effectively reach and serve their immediate community. It seems that we should make full use of currently available signals before attempting to squeeze in more frequencies.

For the past two years WRFD has offered a dozen or more business and local organizations the opportunity to host their own weekly talk show weekday evenings between 7 p.m. and 9 p.m. However, we have only been able to offer the time April through September due to the length of our broadcast day. If WRFD were able to broadcast 24-hours, with an adequate signal to serve our community, we would be able to offer more organizations the opportunity to secure broadcast time.

WRFD's format is a combination of religious teaching and talk with agricultural news and

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information. We broadcast programs from some of the most well-known Bible teachers in the country along with nearly a dozen local pastors. There are at least four other broadcast signals in the Columbus area that provide religious program content. What is to keep the owners and programmers of LPFM stations from duplicating major portions of these current formats? And if they do, what benefit is that to the community?

Another issue I have heard surface in favor of LPFM is the ability to provide opportunities for more minorities and women to enter the broadcast arena. This may or may not be the end result. Organizations that secure licenses for LPFM will feel the need to bring on people who have "some knowledge" of broadcast operations. What is to prevent LPFM owners from wooing women and minorities away from stations who have made the effort to seek them out as applicants, hire and pay them to learn our industry?

Before the FCC moves further into expanding broadcast signals through LPFM, it should consider making full use of the broadcast band potential with current facilities. A move away from clear channel signals will create the potential for more local origination programming, and create an opportunity for dozens of daytime stations to hire and train minorities and women.

Thank you for your time and attention.

Sincerely,

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Dan Craig
General Manager



cc: The Honorable Harold Furchtgott-Roth
The Honorable Susan Ness
The Honorable Michael Powell
The Honorable Gloria Tristani