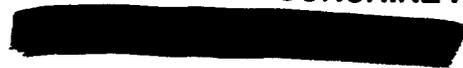


SUNSHINE PERIOD

Mark Blake  
General Manager



January 19, 2000

RECEIVED

The Honorable William E. Kennard, Chairman  
Federal Communications Commission  
Washington, D.C. 20554

JAN 20 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Dear Chairman Kennard:

I write to express my shock and disappointment for the sudden turn of events with low power FM (LPFM). Various media sources have reported that you and the FCC Commissioners are set to vote on a watered down version of the original NPRM on January 20th. As I understand it, the newly proposed service will have a maximum power of 100 watts (LP1000 stations are gone), the new service would be offered on a non-commercial educational basis and the FCC will no longer waive the 2nd adjacent channel protection standard although FCC information showed that this requirement is unnecessary (p. 19-20 of NPRM: FCC-6).

I feel that the public interest which originally motivated this proposed service has been abandoned. There is no technical reason for limiting the power to just 100 watts. If interference really is the concern, a more appropriate standard would be "the lesser of 1,000 watts or the maximum level which can be sustained without causing interference to existing stations". The non-commercial requirement is a blatant attempt on the part of the FCC to protect the financial interest of full power stations. This hinders competition which traditionally have worked in the favor of the public. It also eliminates a source of advertising for small businesses who find it impossible to afford the rates charged by full power stations. The expenses associated with the operation of a LPFM station are not "non-commercial". Why then should these newly created stations be designated that way? The additional requirement that this service be "educational" creates a barrier to minorities and small businesses who had hoped that LPFM would create the entrance to broadcasting which consolidation brought on by the Telecommunications Act of 1996 took away.

In regards to the 2nd adjacent channel restriction, I think that it was unfair that the National Association of Broadcasters (by virtue of their position and spectrum access) was given an opportunity to comment on the technical impact of this requirement. To date, no access was provided to the airwaves for proponents of LPFM to provide quantitative data to support the fact that the 2nd adjacent channel was unnecessary.

I am urging you and the Commissioners to carefully consider the decision to be made on Thursday. I urge to move back to the original parameters of RM-9242 and away from other measures which would severely limit this valuable service. Please do not cave in to the pressure being applied by the National Association of Broadcasters in Congress and at the FCC. LPFM can be a wonderful thing for the American public. It will provide a wider diversity of programming thereby benefiting minorities and religious groups. It will provide a low cost entrance to broadcasting. It will provide an affordable means of advertising for small businesses thereby providing economic stimulation. Please don't water it down.

Sincerely,

*Mark Blake*

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cc: Commissioner Harold Furchtgott-Roth  
Commissioner Michael Powell

~~Commissioner Susan Ness~~  
Commissioner Gloria Tristani

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