

## **WBET AM/WCAV FM**

**Interest:** Radio station owner/operator

### **General opposition to SDARS:**

- SDARS will unnecessarily duplicate existing radio services.

### **Effect of SDARS on conventional broadcasters:**

- Radio has already been hurt by cable TV, direct mail, etc.
- The additional fragmentation of the marketplace SDARS will create will make local radio no longer profitable.
  - This will have devastating effects on community service and local programming.

## **WEMP**

**Interest:** Radio station owner/operator

### **General opposition to SDARS:**

- SDARS will do nothing to increase diversification of ownership, minority employment or public service programming.

### **Effect of SDARS on conventional broadcasters:**

- The additional fragmentation of the marketplace SDARS will create will make local radio no longer profitable.
  - This will have devastating effects on community service and local programming.

### **Regulatory classification:**

- The satellite DARS are claiming that they will provide foreign language channels and obscure programming only as a ploy to satisfy the Commission.
  - Instead, they will attempt to quickly recoup their multimillion dollar investments by targeting mainstream audiences.

## **WFAN AM (GM's comments)**

**Interest:** Radio station owner/operator

### **Licensing policies:**

- The DARS proceeding should be reopened and 50% of the available frequency should be set aside to current radio broadcasters.
  - This will ensure the continued existence of existing local radio.

### **Effect of SDARS on conventional broadcasters:**

- SDARS will harm the ability of terrestrial stations to provide local community service programming.
  - This includes local news, weather reports, disaster warnings, traffic reports and other public service programming.
  - Prior to approving SDARS further studies should be done on the potential harms to existing radio stations.

### **Regulatory classification:**

- SDARS should face the same public interest, equal employment and reasonable access obligations as radio.
- SDARS should be required to carry the niche programming (services to rural listeners, minorities and ethnic groups) that they have promised.
- SDARS should be subscription based to ensure they carry niche programming.

### **Technical standards:**

- SDARS ventures should be prohibited from using ground-based equipment such as terrestrial repeaters to reinforce their signals in urban areas where satellite signals are often blocked.

### **Miscellaneous issues:**

- If SDARS is approved the Commission should also:

- eliminate national and local ownership limits on terrestrial stations to allow fair competition with SDARS operators,
- Prevent a gap in quality by approving in band, on-channel DAB.

## **WGYL FM**

**Interest:** Radio station owner/operator

### **General opposition to SDARS:**

- There is no need for additional radio service. Docket 80-90 provided enough additional service.

### **Effect of SDARS on conventional broadcasters:**

- The additional fragmentation of the marketplace SDARS will create will make local radio no longer profitable.
  - This will have devastating effects on community service and local programming.
  - The result will be a loss of thousands of jobs.

## **WHAS/WAMZ/KNN Radio**

**Interest:** Radio station owner/operator

### **General opposition to SDARS:**

- There is no need for additional radio service. Docket 80-90 provided enough additional service.

### **Effect of SDARS on conventional broadcasters:**

- Local radio in small markets will disappear and, with it, community service programming.

### **Regulatory classification**

- SDARS would be controlled by a few owners with no public service or minority employment obligations.
- The spectrum allocated for SDARS could be better and more profitably used in other ways. (no elaboration)

## **WINC FM/AM**

**Interest:** Radio station owner/operator

### **Effect of SDARS on conventional broadcasters:**

- SDARS operators will likely duplicate the programming of commercial broadcast radio stations.
  - This will further dilute the market and put stations out of business.
  - The Commission should have learned its lesson through docket 80-90, which created unneeded stations that could only be supported through duopolies and "rampant multiple ownership."

## **WJJY Radio**

**Interest:** Radio station owner/operator

### **Effect of SDARS on conventional broadcasters:**

- Most markets already have too many radio stations.
  - This is because of the 80-90 docket.
  - Studies show the industry is saturated and more licensed stations are "dark" than ever before.
  - a 1992 Price-Waterhouse survey showed that almost 60% of stations were losing money.
- SDARS will be the end of local terrestrial radio.
  - SDARS will reduce diversity in ownership.
  - SDARS will eliminate public service programming.

### **Regulatory classification:**

- The satellite DARS applicants have no intention of offering obscure programming for niche audiences and minority groups.
  - Instead, they will attempt to quickly recoup their multimillion dollar investments by targeting mainstream audiences.

## **WMUS AM/FM**

**Interest:** Radio station owner/operator

### **Effect of SDARS on conventional broadcasters:**

- The terrific growth in radio has not occurred in every market.
  - Cable and new FM stations are undercutting current rates.
  - WMUS cannot survive many more changes in the communications industry.
- Satellite DARS will hurt small rural stations, not media companies in large urban centers.
  - This will create a loss in local public service.

### **Regulatory classification:**

- The satellite DARS are unlikely to maintain a subscription system. They will soon want to switch to selling commercials.
- The satellite DARS applicants will not follow through with their promises.
  - They are unlikely to serve minority audiences. Instead, they will target mainstream audiences.

## **WPTN/WGSQ Radio**

**Interest:** Radio station owner/operator

### **General opposition to SDARS:**

- Rather than approve SDARS, the Commission should approve in band, on-channel DAB.

### **Effect of SDARS on conventional broadcasters:**

- The additional fragmentation of the marketplace SDARS will bring will make local radio no longer profitable.
  - Putnam County, Tennessee already has 8 stations serving 50,000 people.

### **Regulatory classification:**

- SDARS will not provide public service or minority employment.

## **WQDR**

**Interest:** Broadcaster

### **General opposition to SDARS:**

- SDARS would be unable to provide the community the local involvement that local radio can.
- SDARS would not offer the same opportunities for employment or diversification of ownership that local radio does.

### **Effect of SDARS on conventional broadcasters:**

- SDARS would fragment radio audiences making small stations in smaller markets unprofitable, thereby destroying local stations.
- Local radio stations would have to drop public service campaigns and promotions to remain competitive.

## **WQDR**

**Interest:** Radio station owner/operator

### **General opposition to SDARS:**

- As a minority (WQDR's General Manager), I am concerned about the fact that SDARS will do nothing to increase diversification of ownership, minority employment or public service programming.

### **Effect of SDARS on conventional broadcasters:**

- The additional fragmentation of the marketplace SDARS will create will make local radio no longer profitable.
  - This will have devastating effects on community service and local programming.

### **Regulatory classification:**

- The satellite DARS will not adopt alternative formats as their proponents claim.
  - Instead, they will target mainstream audiences.
- SDARS should face the same public interest, equal employment and reasonable access obligations as radio.

## WTON

**Interest:** Radio station owner/operator

### **Effect of SDARS on conventional broadcasters:**

- The additional fragmentation of the marketplace SDARS will bring will make local radio no longer profitable.
  - This will have devastating effects on community service and local programming.

### **Regulatory classification:**

- The satellite DARS will not adopt alternative formats as their proponents claim.
  - Instead, they will undoubtedly target the mainstream audiences that are already service by terrestrial radio.