

7B 95-91



DOCKET FILE COPY ORIGINAL

August 24, 1995

1995

COMMISSIONER RACHELLE CHONG  
FEDERAL COMMUNICATIONS COMMISSION  
1919 M ST., NW  
WASHINGTON, DC 20554

Dear Commissioner Rachelle Chong,

I understand that the FCC is about to authorize a new Satellite DAB Service.

As I understand it, this would mean one radio signal that could be heard anywhere in the U.S.

What is the difference between Satellite DAB Service and the existing radio network--? There is no difference except local commitment and local access.

Broadcasting is licensed based on a commitment to public interest, convenience, and necessity. Let's look at each of these three disciplines:

INTEREST- Its not in the public interest to further the "Home Shopping Network" type of retailing across the country. It is not in the public interest to hear only what the National News is reporting. Enough already about O.J. Tell the people what the local school board is doing.

CONVENIENCE- You could go coast to coast on the same station and never have a clue about road conditions, weather systems, prison breaks, or any of a hundred local situations that could affect travel.

NECESSITY- I doubt it if a Satellite DAB Station will tell you that the Spencer, SD School is closed today because of a water main break. I'm quite sure that a Satellite DAB won't do winter storm school closings. Today we have a flash flood warning for a small part of southeast South Dakota. I consider passing along these warnings to our listeners part of our duty.

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On all of these disciplines Satellite DAB fails.



Please remember that we have a National distribution system satellite delivered to local outlets that do everything Satellite DAB could do. Mutual-ABC-NBC-CNN and a host of others all must use local broadcasts to deliver their programming.

Please consider all of the above in making your decision.

Sincerely,

A handwritten signature in cursive script that reads "Joseph R. Shields".

JOSEPH R. SHIELDS  
PRESIDENT/GENERAL MANAGER  
KORN/Q107

46 75-91

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August 21, 1995

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OCT 11 1995

Secretary  
Federal Communications Commission  
1919 M Street NW  
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, DC 20554

Dear Sirs:

The purpose of this letter is to hopefully enlighten you to the ill effects that satellite radio could cause to local radio. It is so difficult to make ends meet now as we employ 18 local people and do our best to serve the public interest as we should. I just can not understand how satellite delivered radio could possibly serve the local public. We as local brodcasters would be forced to compete with high priced talent and programming that we could not match on the local level. Also as we can not compete with the coverage and technical digital quality that satellite radio would offer. Please don't ruin local radio and all the good broadcasters that have for years done their job serving the public interest. Docket 80-90 put a strain on the survival of radio, adding satellite radio could force a lot of us dark and a lot of good people to lose their jobs. Lets stop this now before its too late.

Sincerely,

Del Reynolds  
Owner



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1

Reynolds Communications, Inc. • 1356 Mackinaw Ave. • Cheboygan, MI 49721  
232 E. Front St., Suite 2 • Traverse City, MI 49684  
P.O. Box 981 • Glen Arbor, MI 48636

(616) 627-2341 • 800-348-1051 • (616) 922-0981 • (616) 347-0105 • (616) 334-9810 • Fax (616) 627-7000

JB 95-91



2603 W. Bradley • Champaign, IL 61821  
WLRW 94.5 / 217-352-4141 FAX 217-352-1256 • WIXY 100.3 / 217-355-2222 FAX 217-355-9494

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8/21/95

OCT 11 1995

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF GENERAL COUNSEL

Commissioner Rachelle Chong  
Federal Communications Commission  
1919 M St., NW  
Washington, DC 20554

Dear Commissioner Chong:

Before the FCC considers authorizing a new Satellite DAB service, which would beam 50 to 100 new radio channels into every radio market in the country, PLEASE consider carefully its long term consequences.

Satellite radio would precipitate devastating effects for the community service provided to local communities and local advertisers by local radio, with no replacement in local service or advertising outlets.

I have spent over thirty years trying to prosper by providing good community service. Satellite radio would largely duplicate present musical formats with no regard for local community needs. The country does not need more radio channels....only better.

Sincerely,

Dale Weber  
President/General Manager

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JB 95-91

# KTTS

1260 AM • Country • 94.7 FM

2330 W. Grand • P.O. Box 2180 • Springfield, Missouri 65801 • (417) 865-6614

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August 22, 1995

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OCT 11 1995

Secretary  
Federal Communications Commission  
1919 M St., NW  
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

I am writing both as a broadcaster with 40 years experience and as a board member of the NAB representing the states of Missouri and Kansas.

As stated, I have been in this business for many years and have seen many good and bad things happen to broadcasting. Frankly, Docket 80-90 was one of the true disasters of the past, creating far more radio stations than can possibly exist profitably. No profit, means you can't continue to operate, therefore, the broadcaster must sell to yet another "greater fool" who thinks he might make it and they fail as well. Then the entire cycle starts all over again. Not good for stability and not good for the listeners (tax payers of America).

Now, Satellite Radio is about to really do a number on the small town broadcasters of the nation. Those same broadcasters who have broadcast high school ball games, city council meetings, helped with hundreds of charities and pushed all sorts of drives, from drunk driving to Muscular Dystrophy. Now, 50 channels, all new competitors will come from the sky (DAB), with absolutely no interest in helping any community whatsoever. Satellite Radio is a VERY DANGEROUS service, that will actually do a large DIS-SERVICE to every community in America. It may become known as the "Wal-Mart of the Radio World", putting all local competitors out of business as it sweeps the nation.

I know the FCC is committed to going onward with DAB, but please, put some strict restrictions on this monster. Make it subscription only, with NO ADVERTISING allowed. National advertisers would love to buy only 50 nation wide stations (DAB) and forget about ever buying local stations. It will wreck us all.

Thanks for your concern and understanding.

Regards,

KTTS AM/FM RADIO



Curt Brown  
Vice President/General Manager

cb/pb

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**KSKY**  
*Christian AM* **660** DOCKET FILE COPY ORIGINAL

IB 95-91



10,000 watts

August 22, 1995

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OCT 11 1995

Mr. William Caton  
Acting Secretary  
Federal Communications Commission  
1919 M St, NW  
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

Dear Mr. Caton:

I am writing in reference to the Commission's pending authorization of the new satellite DAB service. I strongly believe that the authorization of such service would be not be in the best interest of the public nor present local broadcasters.

It is my belief that satellite radio would have a dramatic impact on the services provided to local communities by local radio.

I believe, too, that all of us are mature enough to recognize that "paper" promises of multiple foreign language, ethnic and alternative formats will evolve into the same radio formats that are presently used by local channels. These have already proven to be profitable and the extremely costly satellite services will certainly require revenue producing programming. Too, a multiplicity of national programming is already available locally through network programs.

Many of our small market stations are already operating on razor-thin margins. The availability of the "best" personalities on super satellite stations with unlimited budgets would certainly have the impact of further fragmenting radio audiences. This would eventually darken many local services.

We, as broadcasters, support in band, on-channel DAB and want the opportunity to bring this new technology to the American public through the existing radio broadcasting system. I would appreciate every consideration of these points when making your final decision.

Yours,

Ted Sauceman,  
Vice President/General Manager

cc: Chairman Hundt  
Commissioner Quello  
Commissioner Barrett  
Commissioner Ness  
Commissioner Chong

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IB 95-41

# FM 92.3 **KCUL** AM 1410

East Texas Stereo, Inc.  
P.O. Box AA  
Marshall, Texas 75671

Phone 903/935-2500  
FAX 903/938-9730

Studios Located At  
200 Interstate 20  
Marshall, Texas 75670

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August 22, 1995

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OCT 19 1995

Chairman Reed Hundt  
FCC  
1919 M. St., N.W.  
Washington, D.C. 20554

Dear Chairman Hundt:

The radio industry has made an excellent living for my family over 50 years. It has been interesting and challenging as I, and my staffs, have served this area in the public interest.

If DAB service is approved, local radio is doomed. To serve a precious few, and to pad the pockets of media giants, folks like me will fall by the wayside.

To put it bluntly, when you come our way and desire coverage of your event, Tony won't be there. DAB will have run my station off-the-air. Will DAB cover your event? Of course not.

Sincerely,

KCUL AM-FM

H. A. Bridge, Jr.  
Consultant

cc: FCC Commissioner James Qvello  
FCC Commissioner Andrew Barrett  
FCC Commissioner Susan Ness  
✓ FCC Commissioner Rachelle Chong  
FCC Secretary  
Senator Phil Gramm  
Senator Kay Bailey Hutchison  
Congressman Jim Chapman  
National Association of Broadcasters



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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

August 25, 1995

Secretary  
Federal Communications Commission  
1919 M St., NW  
Washington DC 20554

DOCKET FILE COPY ORIGINAL

Dear Secretary,

It has come to my attention that the FCC is on the verge of authorizing a satellite DAB service. We believe this service, over time, could be the straw that breaks the back of not only our radio station, but many other local operators.

It is my belief that "satellite radio" would break up the radio audience, beginning in the smaller markets, resulting in making local radio no longer profitable. This lack of profitability would cause local radio to go out of business resulting in devastating effects on the community service provided to these local communities and local advertisers by local radio.

Satellite radio would provide "new" radio service to relatively few, but would wreck havoc on our industry nationwide. The enormous capital investment required by satellite radio presents an unlikely chance of profitability as a subscriber-based radio service. Satellite radio would be just one "more" network feed utilizing current "old" technology. This technology could be put to better and more profitable uses.

Satellite radio would provide virtually the same programming and formats provided by local radio without providing opportunity for local public interest or minority employment obligations.

There is no need for more competition in radio service. The impact on our station and resultant loss of valuable and irreplaceable local service could have a far-reaching negative effect on our entire community.

Radio had its beginnings in response to an emergency. Radio still provides invaluable communications. Please consider the results of satellite radio.

Very Truly Yours,

Laury Browning  
General Manager  
KKHG

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449 BROADWAY  
NEW YORK, NY 10013  
TEL: 212-966-1059  
FAX: 212-966-9580

August 25, 1995

OCT 11 1995

Commissioner Rachelle Chong, FCC  
1919 M St., NW  
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF PUBLIC AFFAIRS

DOCKET FILE COPY ORIGINAL

Dear Commissioner Chong,

Since diversity seems to have become a negative term around the country these days, it will not be on those grounds that I offer my concerns about the pending decision on satellite radio (DARS), even though, I feel strongly that diverse programming and ownership are worthy of protection.

DARS will be the end of "local" radio as we know it, and with it the "magic of radio" will be lost. Radio will be reduced to just another fast food, one-stop, cookie-cutter industry. It will also mean the end to one of radio's most remarkable attributes, one which makes it such a powerful "local" medium - it's immediacy. You're sitting in Washington, DC, do you really care what Mayor Guiliani said about raising student tuition at City College? Well, NY'ers did, and we covered it, airing voices of dissenters and proponents alike. Where will DARS be?

One of the tenets of our broadcasting philosophy assures that our communities will be provided programming about issues that affect them. This, too, would be lost. It will be impossible for DARS to provide it (would the Commission hold us to a double standard?), and the result would be a competitive environment without room (or time) for "local issues programming". That, I feel, is unacceptable for our medium and our communities.

It is already a shame that, in this time of rapid technological advances, we've only recently seen improvements in radio. Improvements like the AMAX chip which makes such a noticeable difference in sound and reception for the AM Band, and in-band DAB which will provide better "local" competition and a more even playing field. Satellite radio is NOT the solution.

I hope you are not the Commission that drives the stake through the heart of radio - the radio we know and love, the radio that offers opportunity for entrepreneur and conglomerate alike, that allows for programming to and for the communities it serves, and that possesses qualities that make it unique from any other medium.

Let's see DARS match the list of guests that have appeared on our Issues Programs. Guests that range from Governors and Mayors, to US Representatives and Borough Presidents, community leaders and activists, and young people (even gang members) who other wise never have the opportunity to have their voices heard. People whose actions and words affect our local community everyday.

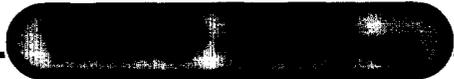
Please protect our great "local medium" - radio.

Sincerely,

  
M.E. HEINEMEYER  
Public Affairs Director

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**THE OLDIES STATION**

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September 12, 1995

Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, DC 20554

DOCKET FILE COPY ORIGINAL  
Commission

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Dear Sir or Madam:

I urge you not to authorize new satellite DAB service. Instead, developing in-band, on-channel DAB is the best way to provide this new technology to the American public.

Satellite DAB, by beaming dozens of additional channels into every radio market in America, will eventually have a devastating effect on many local radio stations. It will be particularly hard on smaller markets where radio operators often work with very minimal profits.

The current radio broadcasting system has fostered local community service that will be jeopardized by a satellite system that pays no regard to local community needs.

Some visionaries have touted satellite DAB's potential to deliver new programming and services not currently available (foreign language, ethnic and other alternative formats). How likely will this actually be? The financial investments required by satellite DAB will instead push these operations into the most lucrative programming possible - the same commercial programming already being provided by existing broadcasters.

While satellite DAB may provide some new service to a tiny fragment of the population (in remote areas, for instance) it will come at great peril to the continued viability of thousands of existing stations.

Do not move in haste today to set in motion a fragmentation that tomorrow will weaken and destroy many broadcaster who genuinely serve their communities!

Sincerely,

Raymond Cal  
President/General Manager

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RC/kw

cc: Chairman Reed Hundt, Commissioner James Quello, Commissioner Andrew Barrett,  
Commissioner Susan Ness, Commissioner Rachele Chong.

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Canisteo Valley Broadcasting

5942 Ashbaugh Hill Road • Hornell, New York 14843-9730 • (607) 324-1480 • Fax: 324-5415

August 18, 1995

DOCKET FILE COPY ORIGINAL

Secretary  
Federal Communications Commission  
1919 M St. NW  
Washington, DC 20554

Dear Secretary,

I am writing in reference to the new satellite DAB service being considered by the FCC. To allow multiple channels into every radio market may be technically exciting but it would spell disaster to local radio as we have known it.

I have been in this industry since the mid-50s. All of my experience--with the exception of a brief stint in Washington, D.C.--has been in small and medium market radio. I think I can tell you what an expanded service such as you are considering would do to local radio.

News coverage, sports coverage (much of it run at a loss but necessary for full service local radio), local talk shows, community involvement will end! Make no mistake about this: automation--and the subsequent loss of jobs--did not come about as a way to save money. That may have prompted some bigger operators to eliminate jobs and service but at the local level it was done to survive. Survival pure and simple! Most small market broadcasters would far prefer three rather than two in the news department or two rather than one. Since the early 80s, many small market stations--in order to survive--have opted out of news and sports. What a pity! Expanded service will mean the death of even more small market, involved, vibrant stations.

As I write this letter, the local Kiwanians have taken over our AM station for a day to raise money for their various civic activities. We extend the same rights to Rotary and Lions. What happens to this local touch if there are 50 to 100 "local" stations? It ends.

Just because we can do something does mean we should! I ask you to consider what havoc these technological will cause. A real part of Americana will disappear and it will never return.

Sincerely,

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THE NEWS AUTHORITY  
**WLEA**

1480 AM  
cc: FCC members

Kevin P. Doran  
Pres/GM

Southern Tier Country  
**WCKR**  
Stereo FM 92 Hornell, N.Y.

4-D-15-71  
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OCT 11 1995



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**KSL RADIO 1160**  
Broadcast House  
55 North Third West  
P.O. Box 1160  
Salt Lake City, Utah 84110-1160

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

September 13, 1995

**RICHARD O. MECHAM**  
Vice President & General Manager  
(801) 575-7235 (801) 575-5555

Commissioner Rachelle Chong  
Federal Communications Commission  
1919 M St., NW  
Washington, DC 20554

Dear Commissioner Chong:

By way of introduction, my name is Richard Mecham and I am currently Vice President and General Manager at KSL Radio in Salt Lake City, Utah. The purpose of this letter is to share my thoughts and feelings regarding the proposed rules and policies for Digital Audio Radio Satellite Service (DARS).

In addressing the potential economic impact of DARS on terrestrial based radio we need to first look at the theory versus the reality of the concept. In theory, DARS will provide rural areas of the country with "major market" sounding broadcast signals. And with 70-100 channels the proponents of DARS will have the potential to provide new services to minority and ethnic groups, non-English speaking audiences, and children's programming.

The reality is that the applicants for DARS will have to invest anywhere from \$320-650 million dollars to get this project off the ground. You cannot cover an investment of that magnitude by catering to rural areas, children and ethnic audiences. The real money is in the major markets AND in the most popular formats (Adult Contemporary, Country, 70's Based Rock, Alternative, CHR, etc.) That's where the DARS applicants will have to go to recoup their investment. And that will also signal the beginning of the end for many terrestrial based radio stations in both small and large markets.

Let's take a look at a hypothetical station and see how it's revenues are generated. For the sake of our discussion the station will have an "Adult Contemporary" format with a 6.0 Share, 12+. According to Miller, Kaplan, Arase & Co., Certified Public Accountants, a typical radio station in the Adult Contemporary format can expect to generate a Power Ratio of 1.5. In other words, the station's audience share may be a 6.0 but the revenue share (% of dollars taken out of the market) would be a 9.0. In a \$50 million dollar radio market the station should expect to bill \$4.5 million.

Now let's assume that DARS becomes a reality. With it's ability to target the entire country you would anticipate that they would be able to hire the best talent, run the biggest promotions, etc. Conservatively assuming that our hypothetical station loses one share of audience to DARS the impact would be as follows:

$$5.0 \text{ Share} \times 1.5 \text{ Power Ratio} = 7.5 \text{ Revenue Share} \times \$50 \text{ Million} = \$3.75 \text{ Million}$$

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Our Adult Contemporary station has just lost \$750,000 in annual revenues. What if the station loses 1.5 - 2.0 Shares of Audience? This is a major market scenario. What happens to small market stations with limited resources that can't afford top talent and major promotions?

The Proposed Rules and Policies for DARS talks about all the jobs that will be created when DARS is implemented. What about all the jobs that will be lost? Our hypothetical radio station just lost \$750,000. If the station chooses to stay in business where do you think the savings will come from? It's called reduction in force and it will not just be engineers that will be let go. It will be sales people, reporters, on-air hosts, public affairs staff, etc. These are not the kinds of people who will be hired by DARS applicants to launch satellites. They will simply be out of work. And these are the very people who generate local and public service programming.

Let's get away from the hypothetical and look at a real world example. KSL Radio in Salt Lake City, Utah. KSL is the only radio station in Salt Lake City that provides locally generated news and talk programming. KSL is involved in an on-going program to get drunk drivers off the road, recognizes outstanding teachers on a weekly basis, conducts an annual Radiothon for a local children's hospital, etc.

As of August 30, 1995, KSL Radio's 12+ Share was a 6.3, a Revenue Share of 13.6 and a Power Ratio of 2.16. Based on a \$44 million dollar radio market the station should theoretically bill approximately \$6,000,000. Conservatively assuming that KSL Radio would lose one share of audience to DARS the impact would be as follows:

$$5.3 \text{ Share} \times 2.16 \text{ Power Ratio} = 11.45 \text{ Revenue Share} \times \$44 \text{ Million} = \$5,038,000.$$

KSL Radio just lost approximately \$1,000,000 in annual revenue. In order to achieve break-even status KSL would have to reduce expenses by approximately \$600,000. That means elimination of local talk hosts, producers, approximately half the news department, etc. How can anyone think that DARS will compliment terrestrial based radio?

In summary, as attractive as the DARS proposal looks on paper (serving rural communities and ethnic populations) the bottomline is that it will be a direct financial competitor with terrestrial based radio. It will put stations off the air, it will eliminate jobs, and it will limit a station's ability to provide local programming and public service.

I appreciate your taking the time to review this letter.

Sincerely,



Richard O. Mecham  
Vice President and General Manager  
KSL Radio

26 95-91

# WPMH 1010AM RADIO

Portsmouth/Norfolk/Virginia Beach/Newport News

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September 13, 1995 DOCKET FILE COPY ORIGINAL

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

The Secretary  
Federal Communications Commission  
1919 M Street., NW  
Washington, DC 20554

Dear Sir:

I am writing in response to the public comment period on the subject of DARS/DIGITAL RADIO BY SATELLITE TO HOME AND AUTO RECEIVERS. I AM OPPOSED TO THE CURRENT PLAN TO GRANT LICENSES FOR THAT PURPOSE.

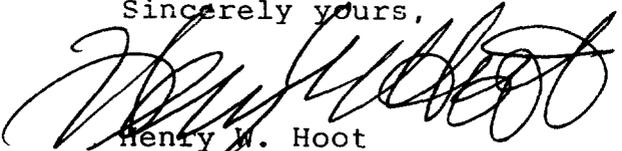
I have been an owner and an operator of radio stations for over 25 years. In my career, most of the stations I have operated have been specialty stations, most with religious formats. We have always devoted a significant amount of our broadcasting time serving our community of license with non paid public affairs programming. We don't mind, we agree that local service is important.

Satellite radio by it's nature will not provide local service. But it will compete with small specialty stations, and maybe even put a lot of us out of business. I'm sure you know that many AM stations are in trouble already.

The FCC has always valued local community service broadcasting. If you want to see that continue, and I believe that you do, then I urge you to defeat the current proposal to grant satellite to home/car licenses that is now under consideration.

Thank you for considering this matter.

Sincerely yours,



Henry W. Hoot  
General Manager

cc: FCC Commissioners

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P. O. Box 1079  
Lynchburg, VA 24505-1079

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September 13, 1995

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

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Secretary  
Federal Communications Commission  
1919 M Street, NW  
Washington, DC 20554

Dear Secretary:

I am very much concerned about the adverse economic impact DARS would have on the small station providing community service.

DARS could not provide the individual, local service that a station such as WBRG is now providing, but could make it impossible for that station to continue with its present extent of such service.

Accordingly, I would like to express my objection to DARS.

Thank you for considering my feeling on this matter.

Yours truly,

TRI-COUNTY BROADCASTING, INC.  
Licensee of WBRG

*Lucy E. Bowman*  
Lucy E. Bowman  
President

- CC: Chairman Reed Hundt
- Commissioner James Quello
- Commissioner Andrew Barrett
- Commissioner Susan Ness
- Commissioner Rachelle Chong

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IB 95-91

# WPAQ

10,000 WATTS  
740 KILOHERTZ

P. O. BOX 907  
MOUNT AIRY, NORTH CAROLINA 27030  
(919) 786-6111

NONDIRECTIONAL  
CLEAR CHANNEL

September 12, 1995

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, DC 20554

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Re: DARS

Dear Secretary:

WPAQ is a daytime only station at 740 KHz. Since 1948 WPAQ has been broadcasting a wide variety of programs which includes folk-mountain music, local news, religious programs (national and local) and various types of music. By offering to a wide rural area a wide choice of programming we have been able to attract different types of audiences during different time segments. Each segment is vital to our survival. We operate on a very small margin of profit.

In contemplating DARS, we are concerned that enormous competition may cause us to lose the financial ability to provide weather information, local news, local religious programs, farm programs, and other local community programs. Even losing one segment such as our national religious programs would put us in the red.

At present our city of license is about 7,600 people, and receives over 20 radio broadcast signals. Why do we need more?

If the FCC is determined to license DARS, then you should auction off the channels to raise much needed money for the government. It simply makes no sense to give away spectrum that is more than all AM and FM spectrum combined. It's a windfall for the four applicants while destroying us. Also, I don't think it's right or fair to have only four licensees. Why not open up process for more applications? Subscription only radio would lessen the damage somewhat.

I have operated WPAQ in what I felt was the local community interest for nearly 50 years. My whole family has been involved. I feel very proud about our station. Now, my son, Kelly is also at WPAQ with me.

Please do not destroy the local service which has taken nearly 50 years to build.

Respectfully,

RADIO STATION WPAQ

*Ralph D. Epperson*  
Ralph D. Epperson

Licensee

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RDE/leb

CC: Chairman Reed Hundt, Commissioner James Quello, Commissioner Andrew Barrett,  
Commissioner Susan Ness, Commissioner Rachelle Chong

Member  
National Association of Broadcasters

Member  
Radio Advertising Bureau

*... making a difference*

# NRB

National Religious Broadcasters

September 13, 1995

*Serving Since 1944*

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

The Honorable Rachele Chong, Commissioner  
Federal Communications Commission  
1919 "M" Street, NW  
Washington, D. C. 20554

DOCKET FILE COPY ORIGINAL

Re: DARS

Dear Commissioner Chong:

This is in response to the Commission's request for comments on DARS. The National Religious Broadcasters, with our 800 members nationwide including over 200 radio stations, hereby states its opposition to the DARS proposal.

Our strong opposition is based on the following concerns:

1 - Threat to local religious stations. Religious stations derive an average of about 50% of their income from national programs and advertisers. Typically, a religious station billing \$25,000 per month probably gets about \$14,000 of that from national programs such as Focus on the Family and Thru the Bible. The balance of the income comes from local churches and advertisers. The national income enables the station to make time available to local churches, local advertisers and other local organizations at an affordable rate. Should DARS realize its obvious but unstated goal of being the only source for these national programs, the local stations without national income would be forced to sharply curtail or discontinue their local church programs and other local programs. The DARS siphoning of national revenues would make local service unsustainable. Thus a local station, serving the local community, could be destroyed. Religious stations typically operate at break even or very thin profits. Any significant erosion of audience or income would be disastrous. We will be happy to provide (on a confidential basis) examples of this.

2 - Local vs National. Local community involvement is very important to religious stations. In particular, they endeavor to encourage family attendance at local church services and related activities. They are involved in most community activities such as local homeless shelters, blood drives and a multitude of other community activities that help to bring different families together in local causes. We feel this is healthy for the community. This localism, the foundation on which the FCC has been issuing radio licenses for sixty years, is threatened by DARS. There seems to be no real compelling public interest reason to turn away from this localism at a time when our communities need revitalizing.

E. Brandt Gustavson, L.L.D., President

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Secretary FCC  
September 13, 1995  
Page 2

3 - Concentration of control. Under one proposal, DARS would be licensed to only four (4) organizations although the band width is over twice that of the AM and FM bands combined. The combination of this concentration of control in only four licensees and the national nature of the service would be harmful to localism, including local expression and local ownership of radio.

4 - Content. It is our strong feeling there needs to be some accountability as to the moral content of programming. There is reason to fear that, lacking some basic moral guidelines, DARS could become a source for the promotion of that which is immoral and inconsistent with widely held American values.

5 - Selection of Licenses. There is plenty of competition in radio today; in fact, it is the most competitive service which the Commission regulates. Many communities have literally dozens of radio stations serving them at this time. There is no compelling need for new radio service, especially if it comes in such wholesale fashion. On the other hand, the government tells us that there is tremendous need to raise revenues, and auctioning spectrum is an obvious way to do it. This is a huge volume of spectrum (50 MHz), and the public should be permitted to bid on it. Then, the winners can decide if they want to provide a satellite radio service, a PCS-like telephone service, or some data transmission service.

6 - Type of service. The DARS service, if authorized, should be subscription-only. The proponents of DARS have said that they believe that their service will be "complementary" to radio, not competitive to it. If so, they should be willing to accept a requirement that all DARS service would be subscription-based. Then it will not compete directly with the free, over-the-air, universal radio service that we have in America. Instead, it will offer those who wish to pay a premium for their special programming needs a vehicle through which to do that.

National Religious Broadcasters does not oppose progress in communication technology, but we feel that any meaningful and fair FCC action must address these concerns.

Sincerely,



E. Brandt Gustavson  
President

IB 95-91



DWIGHT CASE  
PRESIDENT/CEO  
September 13, 1995

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

DOCKET FILE COPY ORIGINAL

Mr. Reed Hundt  
Secretary  
Federal Communication Commission  
1919 'M' St., N. W.  
Washington, D.C. 20554

Secretary Hundt:

I am concerned that as the FCC considers the satellite DAB Service, the work that has been done by the Commission and the Broadcasters to persue fiscally healthy duopolies, will be negated by the entrance of new signals to the marketplace.

Not only will this thin out public service programming, but the fiscal impact on current licensees, who have been scrambling to build a healthy fiscal environment under the current rules, will be easily violated by outside spectrum investors.

Over time the concept may be fiscally viable, but now it will just set back the values of the radio markets health, and render useless the work done by Broadcasters in their desire to bring health to their own industry.

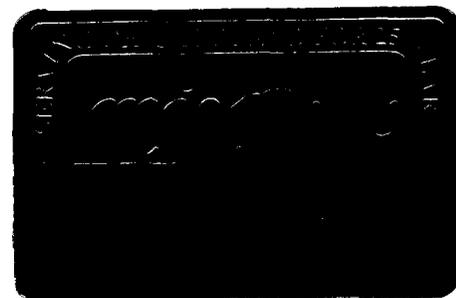
Sincerely,

Dwight Case, President  
Networks America

CC: Jacques Quello, Commissioner  
Andrew Banett  
Susan Ness  
Rachelle Chong

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DREW M. HOROWITZ  
VICE PRESIDENT & GENERAL MANAGER



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September 14, 1995

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OCT 11 1995

Commissioner Rachelle Chong  
Federal Communications Commission  
1919 M Street, NW  
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Dear Commissioner Chong:

As an individual broadcaster I believe the impact of satellite radio on local broadcasting and our communities will be extremely negative. One of the key ingredients that local radio brings to the broadcast mix is our irreplaceable service to the local communities we serve. It is my feeling that satellite radio would extend the fragmentation of radio audiences so that over time we will see local radio no longer be profitable. Satellite radio would also precipitate devastating effects on our community service that we provide.

It appears that satellite radio would offer much of the same programming and formats that are already provided by local radio and would not provide the pie-in-the-sky promises of channels exclusively devoted to multiple foreign language, ethnic and alternative formats. Satellite radio would provide virtually no opportunity for diversification of ownership and would not be obligated to the public interest or minority employment as local broadcasting is currently supporting. I feel there is no need for more radio service, no need for a national radio service and no need for more competition in an already overcrowded segment of the broadcast industry.

As it is currently outlined, satellite radio would be just one more network feed via old satellite technology to new terrestrial gap fillers to reach most of the current audience, not a new technology, as it is currently being touted. A new radio service that satellite radio would provide to a relatively minuscule segment of the population would wreak a national cost of enormous proportions. It also appears that satellite radio would occupy a chunk of valuable spectrum, which could be put to better and more profitable uses.

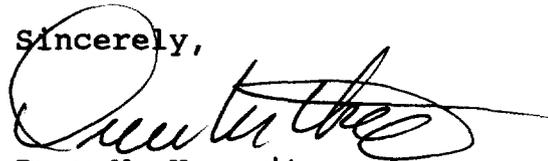
Commissioner Rachelle Chong  
Federal Communications Commission  
September 14, 1995

Page Two

As a broadcaster, I support in band, on-channel DAB and would like the opportunity to bring this new technology to the American public more effectively through the existing radio broadcasting system. Satellite radio, with its enormous capital investment, presents an unlikely chance for financial profitability as a subscriber-based service.

I would appreciate your consideration in the above mentioned matter and hope that when it comes time to cast your vote, local broadcasting and the American public will be the winner.

Sincerely,

A handwritten signature in black ink, appearing to read "Drew M. Horowitz", written in a cursive style with a large loop at the beginning.

Drew M. Horowitz  
Vice President & General Manager

DMH/1k



**970 WZAN**  
HOT TALK

IB 95-91

September 12, 1995

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Commissioner Rachel B. Chong  
Federal Communications Commission  
1919 M Street, NW  
Washington, DC 20554

Dear Ms. Chong:

I would like to register my serious concern to the commission about the devastating effort of satellite DAB.

In smaller markets especially, we must have total community involvement, with local features that can benefit the advertiser. These satellite DAB stations virtually have no public interest or commitment to the community in any way.

By fragmentising the audience any further, our ability to make a profit will be virtually impossible.

All broadcasters are taught to protect your license, your community and to make a profit.

It's hard enough to make a profit now, please don't give us more problems with satellite DAB.

Sincerely,

John C. Butler  
V.P./General Manager

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cc: Randy Odeneal  
Ed Christian  
Warren Lada

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September 13, 1995

Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Mr. Secretary:

As a 25-year owner of a relatively small family operated radio station operation, I am rapidly growing more concerned and pessimistic about the future for me and my family in this business.

From Docket 80-90, to LMA's, LSA's and multiple ownership, it is becoming increasingly difficult to operate profitably, while remaining responsive to the local communities served. Place a new satellite DAB service of 50 to 100 additional radio signals in every market and it just might be the end of many of us. I can not believe this FCC would want to be the one responsible for the demise of radio, as we know it today.

Should Gen. Docket NO. 90-357 be approved; ownership diversification would further erode; church, club, social, civic and local government activities would not receive the now taken for granted PSA's; training grounds and jobs for everyone, including minorities would be greatly diminished and many broadcasters would suffer.

Who would be the winners in a satellite DAB world? Who would be the losers? Who needs satellite DAB when there is so much support for in-band, on-channel DAB.

Sincerely,

William L. Eure

- cc: Chairman Reed Hundt
- Commissioner James Quello
- Commissioner Andrew Barrett
- Commissioner Susan Ness
- ✓ Commissioner Rachelle Chong

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

September 13, 1995

Mr. Reed Hundt, Chairman  
Federal Communications Commission  
1919 M Street, NW  
Washington, DC 20554

Dear Chairman Hundt,

Thank you for your position on the elimination of ownership limits. We especially need some regulation on local ownership. I think it is just fine like it is.

Best regards,



Jim Slone  
President

JS:jt

cc: James H. Quello  
Andrew C. Barrett  
Rachelle B. Chong  
Susan Ness  
Eddie Fritts

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1360 AM  
We play favorites

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OFFICE OF SECRETARY

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September 13, 1995

Federal Communications Commission  
1919 M Street, N.W.  
Washington, DC 20554

Ladies and Gentlemen:

Station WBOB is providing a high level of local service to the community.

To maintain this level of service is costly compared to the small revenue available from a market of our size.

If DARS is permitted to go into operation the economic blow to WBOB may be desasterous. Thus the local service could be lost. Therefore, I wish to express my strong objection to DARS.

Sincerely,

*Deborah Sizer*

Deborah Sizer  
General Manager  
Radio Station  
WBOB

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