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Dear FCC Commissioners:

I would like to register my opposition to the proposed rule changes to create low power FM's proposed by the FCC (Docket 95-25). I am a small market station manager in northern Massachusetts with major market experience at WNBC, New York in the 70's and 80's. I moved back to the area where I grew up after 14 years in New York because I know that local radio can have a positive impact on peoples' lives. However, Docket 80-90 and the proliferation of alternative advertising vehicles such as cable and internet are decimating our profitability and quality, as well as for those stations around us.

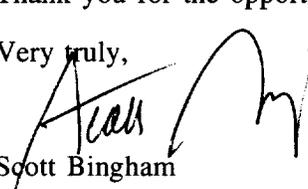
For instance, the station at which I currently work used to Gross \$800,000 annually a decade ago when it was the only local FM in the market. Since two more FM's were dropped into this market of only 125,000, our Grosses have plummeted while our costs of operating a quality facility have continued to increase. And instead of uniting and competing against the other media, the natural human reaction is to do battle with one's perceived radio market competitors. It's a bloodbath. So now, despite a well-listened-to, locally-originating format, the best we can achieve is \$350,000 annually. Plus, as our profitability decreases, it makes us more vulnerable to being devoured as a "delectable commodity" by one of the big conglomerates that have been empowered and emboldened by the FCC and the President with the Telecommunications Act of 1996. If more low-power FM's are dropped in here in the crowded northeast, commercial or non-commercial, our effectiveness, impact and profitability will be further fragmented and diminished...plus our fringe signals which are only minimally protected on co-channel and 1st adjacencies will be further compromised.

Examples: we are currently embroiled in a situation where well-financed radio groups are now buying up the small locals and moving them closer to the metros, effectively blocking other small independent Class A's from ever upgrading. A prime example of this is the CP currently being considered by the FCC for WQVR, Southbridge, MA. The new group owner is proposing moving the tower almost 20 miles to the northeast so he can profit from the Worcester metro. The result: Southbridge loses its only local FM and 1st adjacent station WCAT in Athol, MA to the north loses rights to ever achieve more complete coverage to the north part of our county where terrain can be a real challenge. Another example: short-spaced WCAV Brockton, MA is being reviewed for a move closer to Boston and thus prevents any further upgrade of co-channel 3,000 watt WINQ-FM, Winchendon, MA...again, shutting out another small market indie from competing more effectively in his marketplace. Ouch! This, and Docket 95-25, in my opinion, do not maximally serve the public interest...merely the profit motive of group broadcasters who will automate these stations and feast on new-found riches while putting their stations on "satellite autopilot".

I believe that it would better serve the public interest and localism for the FCC to concentrate on protecting the survival and signals of existing stations and their audiences, particularly the smaller independent O&O's and smaller groups of no more than 5 stations, than contributing to further fragmentation of the band and marketplace. Deregulation has been a bloodbath so far for us, and as a small market broadcaster who appreciates the localism radio has to offer and difference in lives it can make, we need to ask for support and "more of an ear" from the Commission for our very survival. With my major market experience, I could easily work for much more money in Boston...BUT...I choose to make a difference where my heart is. And I think there are many other broadcasters like myself who need your protection right now.

Thank you for the opportunity to contribute comments.

Very truly,


Scott Bingham

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