

To: FCC / Mass Media Bureau

Reply comments in regards to MM Docket 99-25

Submitted by: Americans for Radio Diversity (ARD)

Americans for Radio Diversity (ARD) is a nonprofit organization composed of concerned radio listeners and consumers, dedicated to promoting community orientated public and commercial broadcasting. In interest of this purpose, ARD submits the following comments in response to comments currently filed in the MM 99-25 proceeding.

Response to Comments filed by Dennis Curley, Channel X Radio Network (WCXU, WCXX, W276AY) Dated July 24, 1999

In his Comments Mr. Curley states "we want for the added distribution of informational and instructional material and cultural diversity the FM band is hardly the place..." I think that this comment alone should be cause enough for LPFM.

He further states a concern about the viability of stations in small markets where the profit margins are so low as to barely cover operating expenses. "LPFM may dilute listenership below the critical mass needed to allow professional radio to continue" The major flaws in the argument are many deep. If a station is no longer able to maintain operating expensed due to competition, are they truly meeting the needs of the community they are serving? Further, in those small communities where there isn't a large enough commercial base to support a Major station, Several LPFM stations can service those areas with much more diversity and lower operating expenses.

Finally Mr. Curley feels that the operation of LPFM threatens economic opportunity for professional broadcasters and their advertisers. We understand the concern that "diluting listenership" may hurt major stations, but if these major stations are truly meeting the needs of the community, their listenership shouldn't change. As for the argument regarding advertisers being hurt. With the cost of radio advertising going up, many small "Mom and Pop Shops" are being forced out of radio advertising. The addition of LPFM gives them another chance of radio advertising.

Sincerely
Bill Schuneman ARD member