

IBOC broadcasts need 50% more bandwidth than Analog Radio broadcasts. As a result, full implementation of IBOC will ultimately have the practical effect of reducing available frequencies on the radio spectrum to two-thirds of their present level. Thus, *yet another round of consolidation, in this case technologically induced, is about to hit the radio industry.*

However, *none* of the FCC's 12 studies of marketplace competition in these Dockets take into account the future disappearance of one third of the radio spectrum -- as a directly foreseeable consequence of IBOC operations. This is an oversight so huge that it constitutes a fatal flaw in *any* analysis, by the Commission or anyone else, which: (a) disregards the impact of IBOC; and yet (b) concludes that marketplace competition within the radio industry is now, and will remain, sufficient to justify additional media ownership deregulation.

In closing, we note that VIRGINIA CENTER FOR THE PUBLIC PRESS seems to have been the first commenting party to have raised this point in these Dockets. However, our observation has since been seconded in documents filed in these Dockets by THE AMHERST ALLIANCE and WKJCE GLBT RADIO.

For the reason we have stated, and for the other reasons stated in our February 26 Written Testimony, we urge the FCC to forego *any* further movement toward ownership deregulation. Indeed, we urge the FCC to *reduce* present levels of media consolidation.

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Respectfully submitted,

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