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Office of the Secretary
Rm 222
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Good day to you-

I'm writing to comment on the NPRM submitted last summer by Nickolas E Leggett, et. al., RM9208, on establishing a low power FM service. I agree with his reasoning as to why there should be an LPFM service, but disagree with many of his proposed technical standards; 1w@50' is not enough. I prefer the Rodger Skinner Petition for LPFM filed Feb. 20, 1998, but the following would be good for either a modified Leggett or the LPFM-2 section of Skinner:

- LPFM's would be allowed on any unused FM channel, down to 87.5 where no TV channel 6 exists, with spacing on second adjacent channels
- power limits would be up to 50 watts urban, and 100 watts rural with antenna heights to 150' urban, 200' rural.
- power and height may be less in congested areas.
- frequency coordination, interference resolution, and time sharing arrangements (if any) would be handled by local boards much the same way as in the amateur radio service
- standards of frequency stability, modulation, filtering, etc. which apply to existing broadcasters would also apply to LPFM's
- ownership limits would be one station per person or organization, or if a low power AM service is also instituted, one station per band.
- If TV channel 6 is abandoned with the conversion to digital, the frequencies would go to additional LPFM's with attendant requirements for receivers to receive the additional channels.
- commercials would be allowed, but licensing priority would go to noncommercial stations.

Other possible alternatives- adoption of the canadian low power rules here; reinstatement of the class D license; a low power AM service- 250w max from 1710-1790KHz. Potential listening audiences for many LPFM's would far exceed what the original RM9208 would allow for, so please consider the above suggestions.

Thank you for your time,

Scott Todd

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