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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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RM-9208 FCC MAIL ROOM

In the matter of )  
)  
Propose for creation of Low Power )  
Broadcast Service )  
)  
To FCC / Mass Media Bureau )

RM-9208

Comments on  
PETITION FOR RULEMAKING

1 GENERAL BACKGROUND

By way of background, I developed a love of radio and radio broadcasting at a early age. As a teenager, a friend and myself built a low power AM broadcast station and operated it until closed down by the FCC. ( in the late 1940's) In 1959 the same friend and myself applied for and received a permit to build a class A FM BROADCAST STATION in Oxford Ohio. (WOXR, now WOXY.) Because of a lack of FM receivers and a lack of funding on our part, the station was sold in the mid sixties. In the next ten years I worked as chief engineer at several AM and FM broadcast stations. In 1978 we formed a non profit corporation and applied for two ten watt class D broadcast stations. ( WCXL Kettering Ohio, now WDPR Dayton, Ohio and WQRP West Carrollton Ohio.) WCXL was sold about ten years ago and is now a 6,000 watt station and WQRP is now a 4,000 watt station. I am president of the corporation (Southwestern Ohio Public Radio, Inc.) and general manager of station WQRP.

2 NEED FOR LOW POWER FM SERVICE.

The process of petitioning the Commission to modify the table of allocations to assign a frequency to a community results in alerting a large number of applicants for an available frequency. As a result the applicant with the deepest pockets wins out and the average citizen loses out. The process should be changed to a one step process where the first qualified applicant who proposes a new frequency allocation gets the grant.

The current ownership policies result in a few large corporations buying large numbers of stations with some owning over 100 stations. This has driven up prices and shut out the average citizen.

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The fact that large number of citizens build and operate unlicensed broadcast stations point out the need for a provision for the average citizen to have access to a license to broadcast to the general public. Various power levels could satisfy differing needs. One station could operate for a few hours per week as a hobby, sharing the frequency with other stations and even sharing transmitters. Others could operate full time making a living from the operation of the station.

### 3 TECHNICAL CONSIDERATIONS

Power levels should be divided into various class with differing requirements. Part time stations could operate with power levels from 1 watt to 100 watts. Full time stations could operate with level of from 100 watts to 3000 watts. There should be no limitation on antenna height.

All transmitters should be type accepted or approved. Type approval or acceptance does not add much to the cost of equipment manufactured in quantity. We put WQRP and WCXL on the air for less than \$500 each using rebuilt used equipment that was type accepted. Using non approved equipment is only asking for trouble in interference complaints and possibly being forced from the air after making an investment in time and money. The AM band should not be considered as there is to much clutter on the AM band now.

### 4 OWNERSHIP LIMITS

In order to preserve the local aspect of low power FM, all owners or stockholders should be required to live within 50 miles of the station. There should be no limits on how many stations one group could own provided the coverage area does not overlap by more than a certain small percent. An applicant may want to serve a large city but there may be no frequencies that would cover the city. They could then operate several 10 or 50 watt stations to cover the area. We in fact did this by using WQRP and WCXL at ten watts to cover all of Dayton Ohio.

Respectfully submitted,

Radio Station WQRP  
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