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RM-9242

From: <glenaus@concentric.net>
To: A7.A7(WKENNARD,SNESS,HFURCHTG,MPOWELL,GTRISTAN)
Date: 3/2/98 7:09pm
Subject: LPFM Comments - Please Read

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear FCC Comissioners,

I am writing to make comments in regard to (RM-9208) the Leggett Petition for low power FM broadcasting and the Rodger Skinner proposal for low power FM filed Feb 20th, 1998 (which to my knowledge has not recieved a an FCC file number).

I totally agree with both petitioners reasoning for wanting LPFM implemented. In this post-Telecom Act '96 environment that we live in, it is more important than ever to provide for diverse community voices. The FCC is supposed to treat the airwaves as a public trust and now is a good time to show that the FCC really has that in mind. Below are comments I would like to make based on what I have read in the two petitions.

1) The 1 watt restriction of the Leggett proposal may not allow for sufficient coverage area for some target communities. However the 3000 watt limit put forth in the Skinner proposal may be to high for some metro areas. I would not however rule this out for small rual areas. The two tier system of the Skinner proposal makes since but maybe clamp the high limit at 100 watts.

2) I like Skinner's notion of residental requirements for ownership. However, I suggest shrinking his 50 mile requirement. I have severe doubts someone living 50 miles from me truly knows the community needs of my Minneapolis neighborhood.

3) I would like to see a provision to have a limit of one station per owner. The goal should be diverse voices and community focuss, and this would help achieve that.

4) I do not like the idea of limiting LPFM to one frequency that would be used across the nation as proposed in Leggett. This may cause potential problems with overlap and interference.

5) Equipment used should have to meet minimum specs in respect to stability, filtering, modulation control, etc.

6) If TV goes digital, open up the FM band by including VHF TV channel six at the left of the dial.

7) I support the idea that these LPFM stations can be for profit but special consideration could be given to non-profit and minority appilcants.

8) If Skinner's two tiered system is not used, all broadcasters should meet a minimum number of broadcast hours or forfit the license. Requirements for locally produced content should also be strongly considered.

9) A body of micro-broadcasters could be set-up to oversee the micro-power stations. This would help reduce admistrative costs for the FCC. Self regulatory systems have been shown to work in other arenas such as Ham radio.

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10) If the FCC is not sure how a LPFM system would work, I suggest that the FCC pick a community as a test bed to try out ideas for a LPFM system. Communities already involved in the micro-broadcast movement such as the San Fransico Bay Area, Minneapolis, and Southern Florida would be ideal to start out with.

Thanks for taking time to read my comments. I welcome any comments or questions. If someone besides the FCC Commisioners should see these comments please forward or respond to me and let me know who to send it to. I strongly encourage the FCC to take this to the next step whether it be issuing a NPRM or a NOI.

Sincerely,

Glenn Austin
glenaus@concentric.net
1786 Hennepin Ave S. #28
Minneapolis, MN 55403