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James R. Cunningham
Rt. 2- Box 113B
Stonewall, OK 74871 Phone:(580) 256-4496
April 3, 1998

Before the
Federal Communications Commission
Washington, D.C. 20554

In The Matter Of
Proposal for Creation of the Low Power FM
(LPFM) Broadcast Service

FCC RM-9242

Comments of James R. Cunningham

Mr. Rodger Skinner of TRA Communications Consultants has put together a reasonable Proposal, in our opinion, except we suggest the addition of the following:

1. Since in some Areas, even a Low Power FM Station may not fit in, it seems reasonable to us that AM Radio Channels also be allowed, under the same Provisions.

The use of the AM Band, with Licensing from 1 Watt through 50 Watts has proven practical in several Foreign Countries. It will work here as well. I need only point to the "TIS" Stations used by Federal and Local Governmental Agencies to demonstrate the type Equipment, Antenna, and Coverage.

The use of Low Power AM will greatly assist Schools, Campuses, and Community Leaders where FM Frequencies are not available. Part 15 Rules do not allow enough coverage in some cases, but a power level of 10, 20, or 50 Watts is more than enough to provide small Communities the needed service. This should be allowed, but only under good Engineering Practices, observing Standards set by the FCC, concerning Limits for Radiation, Field Strength, and Harmonics.

2. Our desire is that there be some simplification of the Process of Licensing for FM and AM Low Power Radio, as compared to the full power stations. A number of persons have suggested to us, that the FCC allow for a Commission for Regional and Local "Frequency Coordination" made up of volunteer Licensed Broadcast Engineers, Ham Radio Operators, and Business Professionals, or other qualified individuals.

The idea is to take the bulk of the work out of Low Power Licensing, and to place it on qualified Local and Regional Coordinators, instead of on the already burdened FCC.

All Low Power Licenses would still require the final Approval of the FCC.

3. A third Consideration is this:

Having spent a number of years in the Field Of Broadcast Engineering, I am aware that not everything on the Computer works out IN REAL LIFE. Therefore, I suggest that ALL Licensees be required to do actual "in the Field" Tests using Type Approved Test Equipment made for such purposes, before such a License is finalized.

SINCERELY YOURS,


James R. Cunningham
FCC Lic. #PG-10-2117

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