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Federal Communications Commision
Office of the Secretary
Room 222
1919 M. Street NW
Washington, DC 20554

Sunday, April 19, 1998

RE: RM-9208, RM-9242

To Whom it Concerns at the FCC,

Please add my comments, in this letter, in response to the following petitions, RM-9208 and RM-9242. I am in favor of a Low Power Broadcasting service in hopes that someday I can operate a legally licensed low power radio station to serve my community.

I have some disagreements with some of the proposals found in RM-9208 and RM-9242. I will list some comments here regarding my disagreements to help in considering either one or both of these petitions. At the time of writing this letter, it is my understanding that there are possible more petitions being introduced, but they haven't been assigned a rule-making number yet, so I will concentrate only on those, I am aware of, that have been assigned.

I agree with most of RM-9208, except I would like to see higher power limitations applied. LPFM should be limited to power levels of 100 Watts Maximum ERP. Anything over 100 watts should apply to current licensing procedures and be regarded as regular FM as we have today. Anything below 100 watts should be regarded as Low Power FM.

More power will allow reliable signal coverage and will help attract listeners as well as advertisers wishing to advertise on the LPFM station. RM-9242 suggests a max. power level for a LPFM to be 3000 Watts max. which basically puts that amount of power out of the "Low Power" range. To me LPFM is considered any broadcast operations under 100 watts max.

FCC licensing applications should be issued on a first come first serve basis. I feel that having a "lottery" to award a LPFM frequency is a bad choice. Skinner's petition RM-9242 suggests a "lottery", which will award the license to the highest bidder.

People who wish to apply for a LPFM license should be home-owners (private individuals running a community LPFM out of thier own home), small businesses, educational organizations, and church groups. Such stations should be allowed to broadcast from either a private home or public building. Licensing fees should be set at a reasonable rate, and affordable. Fees could also be determined by the expense paid for broadcasting equipment, coverage, and amount of advertising revenue.

In closing, I am in favor of most of the articles petitioned in RM-9208. If the amended version of Tier 1 and Tier 2 is added by the Leggetts/Schellhardt petition, RM-9208, the Tier 2 power ceiling levels of 5 mile radius would be acceptable.

I am hoping to apply for a LPFM station once set rules and regulations are accepted and applied. I'm looking at approximately 50 watts with antenna height of appx. 60 feet based upon estimated guess. Once LPFM becomes law, depending on new set of rules and regulations governing LPFM, an engineering study will be conducted as to what is needed to operate a legal LPFM Community station in my area.

Sincerely,

John M. Lentz

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