

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

In the matter of)
)
Creation of Low Power FM) RM-9242
(LPFM) Broadcast Service)
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FEDERAL COMMUNICATIONS COMMISSION

COMMENTS

Edward Czelada, President of Superior Communications hereby supply comments in the above reference rulemaking. I agree with the most of the rulemaking filed by J. Roger Skinner, however would like to add some additional technical comments.

Regarding LPFM-1, lessening the restrictions on 2nd and 3rd adjacent separations would best serve the public interest. The separation standards were developed in the pre 1960 era and are out of date with current receiver technology. With the development of ceramic 10.7 MHz IF filters, digital tuning, and narrower IF bandwidths; receiver performance has improved significantly. The FCC has already recognized improvements in receiver technology, take for example, the 1993 case of WCPE.

Current separation requirement for a class "A" to a class "B" on 400/600 kHz channels is 69 km. This does not take in account that the actual interference area decreases as transmitter sites get closer together. For instance, a LPFM with an ERP 1kW at 100 M HAAT that operates near the 54 dBu contour of class "B" station has an interfering contour 94 dBu or an interfering distance of approximately 2.5 km. If the LPFM were operated near the 75 dBu contour of the class station "B" the interference contour would be 115 dBu or only .4 km. In both of these cases the interference area is so small that the new LPFM station should be permitted with a public interest showing, i.e. significant population served. If the LPFM serves 100 times mores persons than it interferes with that it is in the public interest. This would encourage applicants to select a transmitter site that serves the greatest amount of people while interfering with the fewest number of people possible. Since ERP and vertical pattern have the greatest effect on the interference area close to the tower, maybe a slightly lower ERP with a high antenna HAAT would be preferable.

We also strongly recommend that all applications should be selected on a first come first served basis. This will practically eliminate all mutually exclusive applications.

By: Edward Czelada
Edward Czelada
President, Superior Communications

April 25, 1998

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