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Room 222
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# Comments regarding RM-9208 (as amended)

RM-9208 correctly identifies future low power broadcast stations as supplementing (rather than displacing) mainstream media. Not only would microstations provide public services currently absent from most mainstream media, but they may also encourage mainstream media to provide more public services of their own... something they should, by FCC mandate, already be providing. Of the five proposals I have seen thus far, I feel that RM-9208 (as amended) comes closest to achieving these goals.

I am a strong believer that low power broadcasting should be exactly that... low power. Nonetheless, RM-9208, as originally submitted, does not provide adequate power levels to provide a bona fide public service. A revised version of RM-9208 makes provisions for a two-tiered system, allowing a protected broadcast radius of up to 5 miles. This allows ample coverage of most communities, using power levels comparable to that of a few light bulbs. Higher power certainly would allow greater broadcast coverage, but would be unnecessary for those serving a particular community.

RM-9208 proposes assigning a single AM and a single FM channel to a "microstation radio service". Given current spectrum scarcity, this would obviously involve an expansion of the current FM broadcast band, and possible further expansion of the current AM broadcast band. While I would be willing to work within an "in-band" plan for low power broadcasting, I support the Leggett/Schellhardt idea of assigning a specific channel (or channels) solely for low power broadcasting. Despite the current lack of receivers that would be able to tune to extensions of the current broadcast bands, I would be willing to operate a "pioneer" station within any newly allocated spectrum, prior to commercial saturation of revised receivers.

I strongly support RM-9208s proposal regarding preference to high school and university applicants. Many of today's "NPR" college stations rarely originate their own live programming, which lessens their usefulness as a broadcast "training ground" to little more than timing reels and network feeds. Low power broadcast stations would provide alternative places for prospective broadcasters to learn.

Restrictions need to be invoked, such that a new "low power broadcasting service" does not become the next frontier for corporate media conquest. Given the various petitions for low power broadcasting, RM-9208 seems to have the best solution, through limitation of ownership, as well as income restrictions. Nonetheless, gaps do exist that could potentially be exploited by corporate

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interests. I suggest, in addition to the restrictions imposed by RM-9208, either paragraph 11 of the CRC petition, or the part of paragraph 59 of RM-9242 regarding residency within 50 miles of the transmitter site, should be included. As an added suggestion, the FCC should consider the possibility of broadcast programming quotas regarding public service and locally-originated programming (similar to those proposed by the CRC petition), to insure that stations created as a "low power broadcast service" truly serve their communities.

RM-9208 provides a "first come, first served" approach to licensing. This simplifies things greatly for all parties involved. The FCC would not need to divert resources toward holding lotteries or auctions for low power broadcasting licenses. The applicant can receive their licensing with less waiting, less red tape, and less cost, placing them in a position to make their station operational, and serve the public, with greater overall speed.

Required use of type-accepted equipment is questionable. Equipment that is type-accepted adds thousands of dollars to startup costs, making low power broadcasting prohibitive to many. However, spectral purity is paramount. I would support use of non-type-accepted equipment, provided that the station owner and Chief Operator(s) be required to earn a General Radiotelephone Operator License. Revisions of RM-9208 suggests requiring an Advanced Amateur Radio license. In response to this, I note three things: 1) The ARRL will have a fit if an amateur license is used as the high water mark for a new "broadcasting" service, 2) the Advanced license requires the ability to decode carrier wave transmissions at 13 words-per-minute or greater... something that would not be necessary to operate a low power broadcast station, and instead would prohibit many from taking part in this kind of service, and 3) test elements 1 and 3 for the General Radiotelephone Operator License are more thorough, and certainly more "on-target" than any license from the amateur service.

In lieu of any licensing or technical requirements on the behalf of the owner(s)/operator(s), I would support type-acceptance.

A final consideration I will mention involves EAS. None of the petitions make mention of this important service, so rather than create yet another petition for your reading enjoyment, I'll make brief mention of it here. No one will disagree that EAS is a necessary tool as well as a public service. As a cost reducing alternative, I would ask the FCC to consider the possibility of treating future low power broadcasting stations as "Class D" stations regarding EAS, such that two-tone and digital encoders are not required. This would allow microstations to promptly alert listeners regarding National, State, and weather-related advisories and emergencies, without the need for electronic overhead that would be better utilized by higher-powered stations.

Should a large broadcast power/radius be chosen, such as the 3 kW ceiling of RM-9242, please disregard the above paragraph, as 3 kW more accurately resembles a Class A license, which does require two-tone and digital encoders.

Thank you for your consideration.

Sincerely,

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