RM-9242

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Before the
Federal Communications Commission
Washington DC 20554

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FCC MAIL ROOM

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

FCC RM9208, et al.

Comments of Scott Todd

I would like to see a combination of items implemented from the three main LPFM proposals- RM9208, RM9242, and the Community Radio Coalition (CRC). I urge you to use a three tier system using the two from RM9208 plus the CRC proposed maximum of 250 watts at 328 feet as the third tier, with the special events stations proposed by RM9246 sharing tier one. Furthermore, I believe the ownership restrictions should be a combination of *the most restrictive sections* [number of licenses one may hold, residency requirements, etc.] of each of the three proposals with the following exceptions- net assets should be extended to $200,000 exclusive of personal residence instead of $100,000 as proposed in RM9208 (revised) which would have created an economic hole in the middle- too rich for LPFM, too poor for a full power facility. Please also consider a low power AM service with at least the RM9208 tiers of service, with ownership cap of one AM and one FM per operator, maximum.

Additionally, I would like to see other bands opened up to low power broadcasting on some nearly unused (in the US) spectrum. 150-280KHz, 1710-1790KHz- each with 10KHz spacing; 2300-2490KHz and 25.8-26.1MHz with 5KHz spacing and 250 watts maximum and no antenna restrictions on all of the preceeding proposed allocations, one license per band per owner.

Thank you for your attention,

Scott Todd

P.S. Local programming must be provided on no less than 75% of the broadcast day from 6AM to 12Mid with no restrictions 12Mid to 6AM.

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