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April 25, 1998

Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, NW, Rm. 222
Washington, DC 20554

Re: Comments On Petition for Rulemaking
RM No. 9208
"Microstation Radio Broadcast Service"

Dear Ms. Salas,

On behalf of Renard Communications Corp., enclosed please find an original and nine (9) copies of comments on the above-captioned proceeding regarding a proposed Microstation Radio Broadcast Service.

If there are any questions regarding this matter, please do not hesitate to contact the undersigned.

Sincerely,

Craig L. Fox

Craig L. Fox
President

Encs.

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	RM No. 9208
Microstation Radio Broadcast Service	)	
Petition for Rulemaking	)	

To: The Commission

COMMENTS ON PETITION FOR RULEMAKING

Renard Communications Corp. ("Renard"), hereby submits comments on the above-captioned matter regarding the establishment of a Microstation Radio Service.

1. There is no question that a keen interest exists by many parties to "broadcast" their opinions, views, and discussions on pertinent issues. Renard supports this view for minorities, smaller public interest groups, etc. However, Renard is against the development of any such service on the FM band. The temptation by these stations to exist and to broadcast with as much power as possible with easily obtainable equipment would cause chaos beyond belief. The FM band must also be preserved to allow for further development of future full-service FM and translator stations.

2. It is suggested that such opportunities be made available on the AM band with a power and antenna configuration similar to that of Travelers' Information Stations ("TIS"). These stations operate on unused frequencies with up to 10 watts and not more than 50 foot antennas. Their range is usually a few miles and they are in a unique category technically speaking. Because of their relatively low power and limited efficiency

antennas, these stations do not create interfering skywaves and thus can operate on a full-time basis without causing objectionable interference.

3. Most proponents of Micro Radio have expressed the need to have their "voices" heard. Well, the fact is there is no better medium available for talk and the dissemination of information than the AM band. The AM band, for the most part has many frequencies which lay fallow that cannot be used for full-service stations. This is due to several reasons. No new AM applications are accepted for filing, unless full-time service is proposed. As a result, many frequencies literally have nothing at all on them in the daytime. At night, because a TIS type of service does not cause any objectionable interference, these fallow frequencies can be used full-time by low power services. These stations would limited in audio response as are TIS stations so that they can exist and be allocated with only a concern for the impact on existing co-channel and first adjacent stations. That is to say, because of a restricted audio bandwidth, these stations do not "splatter" beyond the first adjacent channel. It might also be possible that a slight improvement in audio frequency response could be used for this class of service. For example, although standard AM broadcast stations use a response up to 10 kHz, these microstations could use a 5 kHz response. Again, this would limit "splatter" potential, but would be an improvement over the 3 kHz used for TIS stations.

4. Also, as result of implementation of the expanded AM band from 1610 kHz - 1700 kHz, there are vast geographic areas beyond those expanded band stations' protected service contours where low-power AM stations can exist without any disruption whatsoever to the new expanded band stations.

5. The availability of frequencies for a new low power service can be done exactly the same way as it is for TIS stations authorized in Section 90.242 of the Commission's Rules. Stations proposing to use this service would have to be located a certain physical distance beyond the protected service contours of full-service AM stations. Those minimum distances presently are at least 130 km. outside of the protected contour for co-channel stations, 15 km. outside the protected contour for first adjacent channel stations and at a location outside of the nighttime skywave service contour of any U.S. Class A station. Distances between microstations, or microstations to TIS stations, should be at least 20 km. for co-channel and 5 km. for first adjacent spacings. These spacings would represent protection to approximately the 2 mv/m field strength which would loosely be considered the service contour of the microstation.

6. Unlike TIS stations which must only maintain 100 Hz frequency stability, it is highly recommended that that 20 Hz be the maximum tolerance for frequency stability of the carrier which is identical to that of full-service stations. This is not at all a difficult tolerance to maintain and is important to minimize low frequency audio rumble between microstations or between microstations and full-service stations. Other technical specifications should be those values typically found in the types of low power transmitters used for pre-sunrise, post-sunset or Class D nighttime stations. The audio circuitry should be similar to that of NRSC except with a maximum flat response of 5 kHz. All transmitters should be type accepted or notified and it would be expected that any microstation service would be licensed as a secondary service to any present or future primary service, but would be authorized on an equal basis with TIS stations.

7. Utilizing the type of allocation scheme and minimum technical requirements presented herein should allow for a meaningful microstation service to develop and be able to serve divergent interests which have emerged needing a forum for public discussion of information and ideas.

Respectfully submitted,

Craig L. Fox
President
Renard Communications Corp.
4853 Manor Hill Dr.
Syracuse, NY 13215-1336

April 25, 1998

CERTIFICATE OF SERVICE

I, Craig L. Fox, hereby certify that a true and correct copy of the foregoing "Comments On Petition for Rulemaking" was sent on this 25th day of April, 1998, via first-class United States mail, postage pre-paid, to the following:

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