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Before the
Federal Communications Commission
Washington DC 20554

In the matter of)
Petition for a Microstation) RM9208, RM9242, plus CRC petition
Radio Broadcasting Service)

Having read objections from many broadcasters regarding a low power radio service, I noticed most focus on two issues. First is band congestion. I urge you to reject these arguments as RM9208, CRC, and part of RM9242 are hardly different than what is currently allowed under the current translator rules, except these stations will provide local origination. I have noticed the NAB is not complaining about the proliferation of translators, probably because they mostly relay member stations. Now they are even proposing negotiated interferance with each other! I would like to second the motion that LPFMs be allowed to bump translators unless it provides fill in coverage within a station's protected contour. Please also allow for low power AM as per RM9208.

Their second objection revolves around interferance to public service and aeronautical communications. I would like to propose that even where type-acceptance would not be required, such as tier 1 (RM9208) stations, there could still be harmonic attenuation and frequency stability requirements that would have to be met such as exist under current FCC rules.

Additionally, many small town stations have been gobbled up to become "rimshots" serving nearby metropolitan areas, leaving no or limited local service. For a few years no station served the Cambridge Minn. area after it became part of a triple-cast for the Mpls./St. Paul area. While a new one sprang up in nearby Mora, other towns may not be so fortunate. Princeton MN is about to lose its FM to a far Mpls. suburb for the purpose of serving Mpls., not that suburb. Localism and format diversity are suffering, and trade publications are even admitting radio is boring. Moreover, while not necessarily serving the same markets, the same programming can be heard on several frequencies simultaneously, especially in intervening rural areas, though sometimes even in metropolitan areas as well. A good example of that is the trio of stations that carry Morningstar christian AC: 1570 AM, KYCR; 95.9FM, WLKX; and 92.9FM, KKJM. Even if their primary service areas don't overlap, a generous portion of their near secondary does. Some other examples audible in my area: 1220 and 1350 have the same nostalgia service; 660 and 1440 carry Radio Disney. I believe the listening public deserves better. Lastly, it will allow the average person to own a station again.

Sincerely,

Scott Todd

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