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WRIGHTSTOWN TOWNSHIP, Bucks County, Pennsylvania

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July 23, 1998

Office of Secretary
Federal Communications Commission
1919 "M" Street, NW, Room 222
Washington, DC 20554

Re.: Petition for Comment — Rulemaking # RM-9208, RM-9242, RM-9246

Dear Sir or Madam:

The following are our comments concerning #RM-9208, RM-9242 and RM-9246, related to low-power radio.

The concept of low-power is almost tailor-made for municipal public — non-commercial, non-religious — radio. For example, Wrightstown Township, relatively small by Pennsylvania standards, is shaped roughly square and covers 10.2 square miles. With only 2,600 inhabitants of all ages, Wrightstown receives virtually no over-the-air radio or television coverage; yet, there are numerous activities that all township citizens should have the right to be informed of or exposed to. Among these are official public meetings, announcements or coverage of community activities, emergency notices, news of community interest, lost and found, and so on.

Currently, there is no way to do this by radio except if a community can secure a conventional FM license for a channel within the 87.5-91.9 MHz public-service segment of the band. For populous communities, such as Warminster (south of us), this is feasible (viz., WRDV-FM). For municipalities of sparser population and limited financial resources, however, this is not economically feasible under the current rules. Somewhere in the consideration of various needs, this appears to have fallen through the cracks.

We thus would like to request that the Commission weigh the virtues of allowing low-power FM and/or AM nonprofit public-service operation for municipal governments, and that such a service be established by the Commission such that the costs involved — from application to execution and maintenance — are modest and the procedures not excessively complex. In our case, it would appear that as little as one Watt or a handful of Watts of power, suitably located on a cell tower within our borders, should be adequate for this sort of need within the 87.5-107.9 MHz FM band.

If this were done in a systematic manner, power could be determined by field coverage, with the goal being minimal intrusion outside each municipality's border. Done thus, a small number of frequencies could be used to cover an entire state, treating each municipality more or less like one "cell," with contiguous municipalities having different frequencies, and so on with frequencies being re-used once field strength from municipalities once or more removed has dropped beyond a designated point, and subject to not causing harmful interference to existing traditional broadcasters with coverage within the same radio market.

In that same spirit, should neighboring municipalities choose to share facilities, an appropriate level of higher power could be authorized to allow for the larger coverage area.

Sincerely,

Jane Magne

Jane Magne
Vice Chairman
Board of Supervisors

c.c.: Chester Pogonowski, Chairman, Board of Supervisors
Allen Masenheimer, Member, Board of Supervisors
Leslie Stimson, *Radio World*