

FCC:

What an positive action this proposal is. Speaking as someone who has worked in radio/TV at many levels, I can honestly say that this proposal would benefit the quality of the industry. Although many in the industry may not \*want\* this, we must all admit the need.

In my comments, I shall attempt to address issues raised in 99-25, in order of paragraph.

In 99-25 paragraph 12, the FCC seeks comments "...on whether a low power radio service could provide new entrants the ability to add their voices to the existing mix of political, social, and entertainment programming, and could address special interests shared by residents of geographically compact areas." I would submit that LPFM would be an ideal avenue for this sort of media access. In particular, limited ownership rules for LPFM owners would tend to create a greater percentage of owners involved for more than just the almighty dollar. It's not that pursuit of money destroys localized programming, it does, however, have a great effect, given the ownership consolidations which occur (indeed, have occured).

In 99-25 paragraph 17, the FCC seeks comments on proposing low power services to the FM band only. I would support this idea, for the same technical reasons that the FCC does. Low power AM stations are very difficult to control in terms of interference, where-as LPFM stations are more predictable in terms of coverage area. This would also greatly reduce the work-load on the FCC in determining potential interference as undoubtedly numerous applications are received.

In paragraph 19, the FCC seeks comment on whether to allow LPFM stations to operate commercially. I believe that just as there are presently both commercial AND non-commercial station, so there will be a should be in LPFM. The entire point that we supporters of Skinner's RM-9242 and related proposals has been we want a level playing field. I have worked in broadcasting for too long to ignore the immediate implications of non-commercial-only rules on LPFM. It should be noted that one of the purposes of LPFM should be to allow small (as in, VERY small) businesses to advertise. Take, for instance, the example of a city the size of Indianapolis. Presently, a pizza chain like "Domino's" or "Papa John's" could advertise on Indianapolis radio, and it would be an efficient use of dollars. That's because a great portion of the broadcasting area is within their delivery areas. But, what about "Joe's Example Homestyle Pizza Joint". Joe can't afford to advertise on ANY Indianapolis station, because 99% of the people he's paying to advertise to aren't in his service area. An LPFM station with a smaller advertising radius would provide a logical alternative for Joe, allowing him to advertise to a more immediate area. Any radio salesperson, if they are being honest with themselves, knows this is true.

In paragraph 20, the FCC seeks comment on whether to allow LPFM stations to seek authority for radio broadcast auxiliary frequencies. This goes back to the level playing field concept. Of course they should, \*however\* I would suggest that LPFM stations authorized as \*secondary\* would also need to yield these frequencies when primary stations have specifically requested their use.

In paragraphs 22-37, the FCC seeks comment on the proposed classed of service: LP1000, LP100, and the possible "micro" radio class. I agree with the logic of LP1000 being primary, and LP100 and micro being secondary services. I \*do\* believe that there is room for a 10 watt "micro" class, and strongly believe that not offering this class would perpetuate an illogical use of radio space. Earlier in my comments, I mention the dilemma of "Joe's Pizza". I believe that sold properly, any of these classes, even \*10\* watt, can be effectively sold. Microradio stations should provide protection to each other, but only co-channel, and \*very\* limited protection (like 2-3 miles). Most of those who I've talked to who are interested in a 10-watt license are wanting to serve \*such\* a small area, that protecting the fringe becomes virtually \*irrelevant\*.

In paragraph 41, the FCC seeks comment on minimum distance separation requirements. I believe that minimum distances BETWEEN LPFM stations should be allowed to be under-cut. LPFM operators aren't asking for full protection in general. We are well aware of how crowded the spectrum is in areas, and the advantage of getting "on" outweighs the advantages of fringe protection, CLEARLY.

In paragraphs 43-45, the FCC seeks comment on 3rd adjacent channel protection. The fact is that equipment, both transmitting and receiving, produced today is \*SO\* superior to equipment produced at the time the 3rd adjacent channel rules were implimented that they have become irrelevant. Many sacrifices have been made (like B/W TV to color TV) to allow compatibility with older equipment. To retain 3rd adjacent protection standards (especially at these LOW power levels) is going \*TOO FAR\*. In protecting the older equipment (the PAST), we must not nullify the FUTURE. We must consider the continued efficient use of the radio spectrum, which is different now than in the past, and will be different 50 years from now (when we have 1000 channels of digital audio & video in a Khz...hahaha).

In paragraph 46, the FCC seeks comment on 2nd adjacent channel protections. I believe that some degree of protection is necessary, but I believe that given newer equipment, newer formulas are in order. Clearly, short spacing protections were designed for a technology which is largely non-existent. In the age of digitizing communications, we must make certain assumptions regarding \*extremely\* outdated equipment. We must assume that replacing the equipment is no longer a significant expense for the listeners, and the great majority of listeners already have newer receivers quite capable of dealing with 2nd adjacent interference.

In paragraph 47, the FCC discusses 2nd adjacent protection with regards to IBOC. Even many of the IBOC developers stated that 2nd adjacent interference shouldn't pose a problem.

Regarding paragraphs 51-56, the FCC seeks comment on different limits for frequency deviation (modulation) for LPFM. LEVEL PLAYING FIELD. Placing different deviation limits on LPFM is at best pointless, and would DOOM the service. There is, after all, a REASON that on-air audio processing is a MULTI-MILLION dollar business. Additionally, equipment costs would go "through the roof" for a low power station, as used equipment would no longer be an option.

In paragraphs 57-67, the FCC discusses ownership and eligibility. This is the \*most\* important aspect of what we would like in LPFM. First, we MUST NOT allow existing broadcasters to buy up LPFM, to do so would make the entire service a waste of time. Strict ownership requirements and limitations are essential. It is disturbing that residency requirements can't be enforced thanks to congress. It is a shame, as this would ensure what I, those I've talked to, and many at the FCC appear to want.

In paragraph 68, the FCC seeks comment on local programming. Please word this VERY carefully in any action you take. None of us want 5000 LPFM stations broadcasting the same satellite 59.8 minutes per hour, PLEASE!!!!!!

In paragraph 69, the FCC discusses commercial programming. As I've said earlier in this comment, in order to provide a level playing field, commercials must be allowed.

In general, I would support electronic filing with a short (perhaps one week) filing period. A short filing period could reduce the numbers of deep-pocketed parties who may not care about serving a particular community.

In conclusion, 99-25 is obviously well-written proposal. I would urge Chairman Kennard to stick to his guns on this one. We know that you are going out on a limb for us. We believe, as you do, that this service is necessary, and that the time for it has come.