

Before the
Federal Communications Commission
Washington, D.C. 20554

In the matter of) MM Docket No. 99-25
)
Creation of a Low) RM-9208
Power Radio Service) RM-9242

To: The Commission

COMMENTS

Joseph A. Belisle submits the following comments with respect to the multiple ownership and application processing aspects of this proceeding:

The Commission can achieve a degree of Low Power FM (LPFM) ownership diversity without imposing any multiple ownership rules upon LPFM applicants, if it adopts a window filing procedure coupled with a filing limit of one application per window. Applicants in each filing window would file for the station they deem to be the single most important available facility.

Eliminating multiple applications from the same applicant will reduce the mathematical probability of mutually exclusive applications

and will disperse LPFM stations among the maximum number of individual licensees.

Respectfully submitted,

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