

Comments on FCC Notice of Proposed Rulemaking (FCC 99-6)
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First, I would like to applaud the Commission for taking this action. I believe that there is most definitely a place for low-powered local broadcasting in today's world. My comments are from the perspective of a potential LP100 licensee. I live in Sundance, Utah, a small community¹ that despite being only 60km from most of the transmitters that serve the Salt Lake City area is not well served by the existing stations. Signal quality is poor-to-nonexistent due to terrain factors, and there is very little information that relates directly to our community, as they tend to focus more on the larger community of Salt Lake City. We have been looking into ways that we could provide local information and especially emergency information to residents and guests in the event of a fire, avalanche, or other event. Since the Salt Lake City metropolitan area is so close, and the airwaves are so congested, there is no frequency available under current FCC rules that would allow us to have our own station. We are currently working with a station in Salt Lake City to determine the feasibility of installing a repeater, but according to Commission rules this could only originate transmissions for emergency warnings of imminent danger₌ and such emergency transmissions could be no longer or more frequent than necessary to protect life and property.₌ It could not be used to notify residents of upcoming community events or presumably even to inform them of a controlled burn that posed no threat to life or property.

I am in general agreement with the technical standards you have proposed for the new classes of service. I also agree that the LP100 stations should have fewer requirements in terms of hours of broadcast. It is unlikely that a community as small as ours would be able to operate on a full-time basis. I do have one suggestion that runs counter to the Commission's current thinking, and that is that it might be advantageous to allow LP100 stations to act as translators to fill out their broadcast day. It could be argued that this could encourage such stations to be lazy and not attempt to fill the day with original programming, so the times when a station could act as a translator could be restricted to the late-night and early morning hours (e.g. midnight to 8AM). That would allow the station to stay on the air rather than shutting off every night.

It is important to keep the application process simple and therefore inexpensive. X communities or individuals wishing to implement a low-power FM station should not have to resort to hiring a consulting engineer to find an available frequency and verify that it will not interfere with existing stations. Thus, I support the Commission's proposed distance separation requirements for determining available frequencies. I would also suggest that, to discourage trafficking in construction permits and speculative applications, a single entity should only be allowed a single application in any filing period. This would still allow for multiple stations owned by an entity, but would (1) reduce the number of applications that the Commission would have to deal with in any one filing period, and (2) prevent (or at least discourage) people from attempting to grab₌ as many prime frequency allocations as they could get their hands on in the initial filing period.

Low cost-of-entry should be a priority for the LP100 stations. This means that existing, off-the-shelf hardware must be able to be used for this new class of

¹Sundance is located in the North Fork of the Provo Canyon, which is in a wildland/urban interf. a consisting of 7,000 acres of privately owned land surrounded by National Forest and wilderness a. The area includes 258 dwelling units and 116 vacant lots. One hundred and twenty people are 1-time residents, and it is estimated that 7,500 people may be using the area at any given time ing peak seasons.

service. I expect that many licensees would start out by buying used equipment. Thus, any reduction of channel bandwidth that would necessitate new lines of equipment or significant modifications to existing equipment should be avoided. Personally, I would not mind a restriction for LP100 service that it operate in mono only and without SCA. This should serve to reduce the number of significant sidebands that would be generated by these stations, if I understand my FM modulation theory correctly. I firmly believe that it is content, not technical considerations, that cause people to listen to a particular station. For example, station WMBR in Cambridge, MA was broadcasting in mono until the mid-1980s but that did not prevent it from being the first station in the country to broadcast punk rock and other unique programming. I worked at the station from 1982-1984 and never received or heard of any complaint that someone refused to listen because the station did not broadcast in stereo. On the SCA side of things, it is my understanding that some monitoring equipment uses an SCA channel to provide information back to the studio. However, it is my belief that most LP100 stations will have their studios and transmitters co-located due to cost considerations, thus reducing or eliminating the need for STLs and remote control and monitoring equipment.

Along the same lines as above, since off-the-shelf equipment should be usable for LP100 service, and since at least some licensees will want to go the used equipment route, I suggest a minimum ERP of 25-30 watts for this class of service. My survey of available equipment shows a number of 100 watt transmitters available, but these are unlikely to be available used at this time. However, there do seem to be quite a few 30 watt exciters available used that can be used as low-power transmitters, and a minimum ERP of 50 watts would require a 4-bay antenna to be used to get the necessary 3dB power gain. Although exciters of recent vintage may be frequency-agile, antennas are not, so it is my belief that there will be few available used antennas that would meet the needs of new licensees. Thus, the cost of a new antenna becomes a significant cost consideration.

Finally, regarding character qualifications relating to previously and currently unlicensed operators, I believe that without their actions the Commission would not be taking this action today, so they should not be automatically banned. Certainly those who have (knowingly or otherwise) caused interference should not be permitted to hold a license, but I believe that those who can show that they acted responsibly in attempting to avoid interference should be considered.