

I would like to propose the following comments in regards to the LPFM proceeding currently before the commission:

1. A temporary stay of enforcement during the rulemaking proceeding, except in cases of interference to emergency services.
2. Amnesty for existing microradio stations.
3. Either 1. {A LP-10 class (1-10 watts ERP) to be designated as a "secondary" service and a LP-100(10-100 watts ERP) class designated as a "primary" service, enjoying all the protections of a primary classification,} or 2. {A licensing system based on ERP needed for a particular service contour., ie. In a particular situation, 10 watts may produce a 6 mile service area, but in a different location, 10 watts would only produce 2 miles of coverage, so more wattage would be required to cover the same terrain.} \*.See Footnote 1.
4. Studio facilities must be located within the primary contour of the transmitting facilities.
5. Local license holding; no absentee ownership.
6. Only one station per owning organization, and that organization cannot have controlling members in common with other stations.
7. A majority of locally relevant programming.
8. Equipment shall be "type accepted" which will meet basic technical criteria in respect to stability, filtering and modulation control.
9. Licensing preference will be given to racial minorities and the economically disadvantaged.
10. Upon adoption of a LPFM service, that they be included in the transition to IBOC digital broadcasting.
11. Exemption from EAS (Emergency Alert System), except in cases where a full-power class A thru C is not present in the local area to provide such a service.
12. Licensees shall be either unincorporated not-for-profit associations or non-profit (501(c)(3)) corporations.
13. Problems, whether technical or otherwise, shall be first referred to the local or regional voluntary micropower organization for technical assistance or voluntary mediation. The FCC shall be the forum of last resort.
14. Licensing fees shall not exceed \$200.
15. 3rd and possibly 2nd adjacent separation standards be relaxed to allow LPFM stations the needed spectrum space. Further, all manufacturers of consumer radio receivers for sale in the United States shall be required to conform to sensitivity and selectivity performance standards to allow effective reception of LPFM stations.
16. The spacing standards be revised to include spacing conventions as they would apply to LPFM stations.

17. RF exposure guidelines be updated as they would apply to LPFM.

18. Non-commercial only operation.

19. All applications use a up to date North American Datum location, or GPS coordinates to indicate tower location.

Footnote 1: If the second, contour-based option was adopted, then a sliding separation system would have to be devised to accommodate this method of licensing.