

I support the creation of the LPFM guidelines and would like to suggest the following:

1. LPFM should allow for "commercial" (commercially supported) as well as "non-commercial" stations.

2. The 60 meter (197 feet) limitation on Class LP-1000 stations in the FCC NPRM should be increased to 100 meters (328 feet), which is the same as for Class-A full-power FM stations. This would provide for an additional 2-3/4 miles of coverage without requiring any additional power. Distance to 60 dBu contour would increase from 8.8 miles to 11.76 miles, which could help LPFM stations reach significantly more people and thus enhance their opportunity to survive.

3. Mileage separation tables should be provided for other powers in addition to the 1,000 watt and 100 watt stations. For example, have a table for each 100 watts down from 1,000 (900,800,700 ect.) so that if a channel won't hold 1,000 watts, it may be able to hold 700 watts or 600 watts, etc.

4. Some form of ownership restrictions needs to be in place to keep this service for "local owners" so as to not be snapped up by the large corporate broadcasters. The "50-mile rule", proposed in RM-9242, that requires an owner to live within 50-miles of his/her proposed antenna site would work nicely and would be easy to enforce by requiring app