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Federal Communications Commission
Washington D.C.

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FCC MAIL ROOM

In the matter of
Proposal for creation of the Low Power FM
(LPFM) Broadcast Servic
Docket No mm 99-25

DOCKET FILE COPY ORIGINAL

To: Federal Communications Commission

Enclosed in this letter are my comments pertaining to Docket Number MM 99-25 regarding the creation of a new type of Low Power FM radio service. I am in FULL support of this matter of creation but with a few ideas and comments that should be taken into consideration by the commission if LPFM were to be adopted and made into a workable service. I am an individual with no connection to any corporation or activist group. I am a person that the NAB considers the "General Public". Please Take the time to read my comments and apply them towards a "YES" vote to create a much needed, local, Low Power FM radio service. You will find my one original letter and nine copies to be disbursed to the appropriate individuals. Thank You.

Sincerely:



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List ABCDE

Although we have come this far as to almost adopting a workable Low Power FM broadcast service, some more work is needed as to agree on proposed terms to make this a success. In my notes I will point out what I think is important, what needs changing, and what I disagree on.

The first thing that comes to mind is "Should LPFM be a service supported financially by the use of paid advertising". This is kind of a double edge sword. The problem we have now with commercial FM corporate radio stations is just that. These stations bombard the listeners constantly with obnoxious, loud, commercials, leaving little time to play music or talk show programming. Constantly when I am listening to a talk show that has some interest to me, it seems that the show is constantly being interrupted with "commercial" breaks. Very annoying. On the LPFM level, I believe that with equipment costs of starting a LP-1000 station that the operator would want to recoup his money by having a station that can bring in revenue by the use of commercials. On the LP-100 level, I know that the equipment costs are generally low and the service area would be very local. For the LP-100 service I suggest that it be commercial free. If we have to have commercials let the LP-1000 operator be able to do it. It seems that when there are commercials during a radio show, the show suffers by all the commercial breaks, and quite frankly, the listener suffers through the barrage of commercials also. This kind of hurts the radio station because the listener changes channels when a commercial is aired much like people change the TV station when commercials come on. Sometimes the listener or TV viewer never comes back to the station he was listening to. I think that the LP-100 operator should be non-commercial and have first rights to the non-commercial portion of the FM band. I also think the LP-1000 operator should be able to air commercials because of the costs involved in running a larger station but have some sort of cap on the number of commercials per hour. This is not too much to ask for. The whole idea of LPFM is radio for the community and not greed. We have that already "GREED" with corporate commercial radio stations and the programming suffers tremendously.

Ownership Guidelines:

In Docket MM 99-25, it is suggested that any person who wishes to start a LPFM radio station live in a 50 mile radius of the station. I think this is way too much of a radius. I believe the owner of the station should be limited to his service area. Again, the whole idea of LPFM is community radio, and the owner/operator SHOULD live in that community that the station serves. Fifty miles is too far away. Like I said before, we have that already existing in commercial corporate FM radio. The owners, realistically corporate monopolies, who own the radio stations are sometimes 1000 miles away. How do they (corporations) know what the people (listening public) want to hear on the radio 1000 miles away from the stations owner, mind you I am referring to the stations owner as a corporation. Just because one format works in one city it doesn't mean it will work in a city 1000 miles away. What we need is an owner of a LPFM station that lives in the service area of the station that he owns, so he knows exactly what is going on with his station. That is what I call community radio.

Continuing on about ownership regulations, there should be one more criteria established for ownership of a LPFM radio station. It should be PROVEN that the person wanting to own a LPFM radio station has NO affiliation with any other broadcast service. In this day and age of all kinds of legal loopholes I can see one problem that might arise out of ownership of a LPFM station. With all kinds of corporations and subsidiaries and holding companies it MUST be proven that the person wanting a LPFM station is in NO WAY connected to an already existing broadcast service, be it AM, FM, or TV. This has to be abided by because of the little available frequencys for LPFM as to give the "little guy" a shot at running a LPFM station. I also wish to see that an already existing AM radio station be given absolutly NO chance in obtaining a LPFM station. Even if the AM station relinquishes his license to be able to run a LPFM station, Theres just no way the little guy who wants to start a LPFM station who got bumped by the AM station could afford or possibly try to aquire that now vacant AM station. Please see that AM stations will not be allowed to apply for LPFM licenses. Those guys (AM Stations) already have a working station, they don't need an FM station.

Applications:

I think the application procedure for a LPFM station should be fairly simple. There should be a first-come first-served procedure granted only if the applicant has met the criteria of living within that stations service area and is not connected to an already existing broadcast service. There should be no lottery or bidding procedures, because the guy with the most money always wins. This is not fare. Again, we have that now with commercial FM stations. The guys with the most money won. They own several radio stations. The price of licences for LPFM should be affordably yet different. What I mean by this is that a LP-1000 license should cost more than a LP-100 because the LP-1000 station covers more area and if allowed commercials, would bring in more revenu than a non commercial LP-100 or even a commercial LP-100. One more note is the licensing of a person who has previously disobeyed the commissions rules on operating a radio station. I'm talking about the guy who was running a pirate radio station and got cought by the FCC. I think that if someone was running a pirate radio station and got warned from the FCC about his station, and he (the pirate operator) immediatly shut down and never resumed should be able to apply for a LPFM license without predjudice. The pirate operator who was told to shut down and blatently refused and continued on should NOT be able to posses a LPFM license. Must I remind you at the commission that it is these people (pirate operators) who got the ball rolling on this whole LPFM issue. I do not advocate pirate operators nor am I one, but sometimes it takes this action (pirate radio) to bring on change and awareness.

Type Of Equipment:

There are several points of views on the type of broadcast equipment that should be allowed for the LPFM station to operate. I think that the first piece of gear used to broadcast a signal, the transmitter, or exciter, should definitely be one of FCC type accepted. These type-accepted units are FCC examined and tested to comply with the stringent rules the commission set forth. The use of "home built" or "kit" exciters must not be used. Who knows how frequency stable these units are. Even if they are PLL units, the approval stamp has not been issued by the FCC. People should not be allowed to slap together a kit transmitter and get on the air. If someone is serious about broadcasting using LPFM then they should spend the money on quality FCC type accepted exciters. The next piece of equipment is the amplifier. I think you should be able to use non-type accepted amplifiers provided a professionally built and tested good quality filter is used after the amplifier. This would eliminate spurious harmonics so as not to interfere with say the aero-band. It is more important that the exciter be frequency stable and properly modulated so it does not exceed the 75khz allowable deviation. This is extremely important as this is where the possible interference would come into play. Even if the amplifier was built poorly, with a good filter after it, the only problem one might have with the amp is that it would not put out the proper wattage, which the operator would want to correct anyway. The amp, if built improperly, would not put out excess wattage, it would put LESS wattage out. The amp only amplifies whats going into it. If the exciter is not on frequency or deviates excessively the amp only makes the exciter's output worse. Even type accepted amps would amplify unstable exciters. This is why the EXCITER needs to be type-accepted.

Antenna Height Proposals:

I think that the proposed heights of antennas for LPFM set by the commission is fair. I still find myself going back to the point that this is supposed to be LOW POWER FM, and the proposed heights and contours of LP-1000 and LP-100 stations seem to be just fine.

Channel Restrictions:

As you can probably see in this letter, I am a big fan of the LP-100 class of service. I feel that with a station operating within the LP-100 guidelines, the 1st, 2nd, and 3rd adjacent channel restrictions should be ELIMINATED! Again, as I have written before, there is NO WAY a LP-100 station will interfere with a full power or even a 100kw station on the FIRST adjacent channel. It just won't happen. The LP-100 station is just too small of a signal to interfere with a higher power station even if the LP-100 station was on the FIRST adjacent channel to that high power station. The only interference in this picture would be TO the LP-100 station FROM the high power station. I have seen a 100 watt station on the SAME frequency as a 100kw station. There was so much reflected power back into the 100 watt station from the 100kw station, that the operator of the 100 watt station was worried that his equipment was going to be damaged. And to top it off, while the 100 watt station was broadcasting on the 100kw station's frequency, the interference TO the 100kw station was only present for 200 feet from the 100 watt station's antenna. After 200 feet, the 100kw station came in to a receiver fine, with NO interference, and this was on the SAME frequency. So I don't believe that 1st, 2nd, or 3rd channels will be affected. NO WAY!

Channel Restrictions:

This is my views on channel restrictions for a LP-1000 station. I think there should be FIRST adjacent channel restrictions applied to LP-1000 stations. There again should not be 2nd or 3rd channel restrictions applied to LP-1000 stations. It is just to small of a wattage for worry. With the many short spaced grandfathered stations already in use, it should be noted that a power of 1000 watts, much less than the grandfather stations, certainly will not affect 2nd or 3rd adjacent channels. It probably won't affect 1st adjacent channels, but better to be safe. I must point out another important FACT. Again going back to pirate radio operators. Pirate radio has been going on for a long time now, and there is probable less than 10 cases where there was interference. The reason the pirate guys got caught is NOT because of interference, but because a legal commercial station turned them (pirate) into the FCC because the commercial station was worried about losing listners, NOT because of interference. Proponents of LPFM are so worried about interfeerence, but it has been proven for a long time now that generally, if not all the time, LPFM does NOT cause interference. We can thank the "smart" pirates for proving this, even though it is not the right way of going about this. So I don't see a need for channel restrictions for LP-100 and maybe 1st adjacent restrictions for a LP-1000 station.

Milage Seperation Tables:

If somebody wanted to start a LP-1000 station and say that the spectrum in his area could not support a 1000 watt station, then I think that should be it. No LP-1000 station. I don't want to see any kind of further research done to see if that frequency will hold a 500 or 200 watt station. Give the LP-100 guy a chance to start operations. It's not fare that if a frequency will not hold a 1000 watt station but will hold a 400 watt station that that frequency be given to the original person who wanted to start a 1000 watt station, but will settly for 400 watts. Like I said, let a couple of 100 watt stations bloom. I don't want to see a guy who wants a 100 watt station get bumped by someone who really wanted a 1000 watt station, but was only approved for half of that. So in closing on this, if a frequency won't support a 1000 watt station, too bad, thats it. No 1000 watt or less but above 100 watt station.

In closing, I hope you will have read my ideas and take them into consideration towards the creation of LPFM. I am happy to see how far this concept has gotten so far, and I know we can reach a happy ending with a workable community oriented LPFM service, one unlike the current commercial FM radio crap we have now. Thank you.

Sincerly;



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