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99-25

RE: RM-99-25,99-6
Federal Communications Commission
445 12th St.
Room TW-A306
Secretary, Magalie Roman Salas
SW Washington D.C. 20554
RE: RM 99-25,99-6
Comments.

Gentlemen:

I want, need and deserve a license. After devoting some 31 years of my life towards broadcasting, I have little to show for it.

I am strongly in favor of the creation of a new "Low Power FM" braodcast service. But the AM broadcast band should not be cast out as not being able to fill the bill in some situations. It is possible to mount a medium wave AM antenna high on a tower and incorporate some beam tilt to point the magnetic field down towards the service area. Without creating an undesirable skywave.

Now on to FM...
In opening I find the ERP power levels mentioned quite generous. This is far from the 4 watts I thought I needed. I have a home receiver that will deliver full quieting with 25uv and the car receiver only wants 10 uv. I mentioned before in earlier comments that part of communicating is listening. And if the listener is really interested in that program he'll put up with a less than perfect signal. Like when parents are listening to their kid in a ball game at their high school. I am sure there are many instances where power is needed to cover greater distances and catch people in their cars or tractors.
I believe it should be made possible that the total ERP omni-directional, be allowed to be shaped to benefit the specific requirements of the local geography of the local terrain. Here in the DesPlaines river valley, we might want to direct our signal up and down the valley. I could see some situation where one might need to direct a signal through to some towns on winding mountainous roads.

I do not believe the lower non-commercial educational channels should be ridgidly used as such in regards to the proposed LPFM service. I believe I CAN and should be able to MAKE MONEY with my station. I find out here in Lockport-Homer township there are about 9,nine unused or seldom used channels in the educational portion above 88 Mhz. So if I'm stuck being licensed down there I should be able to profit. If someone asks to be non-commercial down there thats a different story.

I believe what all the interest in this service is all about is getting on the air. So I'm all for the different gradient power levels. Granted, if some situation really calls for the need for some serious power, it would be an exercise in futility not to get them the power to get the job done! But on the other hand if we are too gready we will just shut out our fellow broadcaster.
REALLY... I only want to service my community and the adjoining community to it. That is a radius of 7 to 8 miles.The whole idea was that this was to be a local station and that someone too far away is no longer in a convenient position to take advantage of the commerce or sales in the ads. I would like to deliver a signal 10 times that needed by my home receiver or 250 uv at the edge of my service area. After the shadowing by this hilly terrain there is something to be desired of this signal level. But I do not want to be greedy.

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List ABCDE

In response to the problem of competing applications for a license. When I was in broadcasting there were two separate corporations that shared a common transmitter and site. One got overnights and AM drive and the other got afternoons and PM drive. One solution could be to get the two entities together if there is competing applications and have them work out a favorable sharing of the frequency. Perhaps because of the low power they could even maintain their own separate facilities.

I am in favor of the "no minimum" HAAT for the proposed tower height requirements. The antennas that we will probably use will be small. There are some economic "breaks" that occur when sizing towers as to wind loading and "face" requirements that then become needed. Some broadcasters I'm sure will make judicious use of the compromise in costs relative to the minor benefit in range.

I am certain that receiver technology has come a long way over the years that we do NOT have to worry about 2nd and 3rd adjacent channel interference. Just the advent of the PLL phase locked loop receiver has taken away the fine tuning that one would constantly be doing when the receiver would change temperature, or as one would be driving further out of range, think tuning the station in is going to help.
I am not in favor of the IF protection. What we want to do here is license broadcasters. Not stop them thinking something might happen. If the image interference is so bad make the station reduce power.

In order to lessen the likelyhood of interference and license as many stations as possible you the FCC may want to consider mandatory deviation limitations of +\- 60 or 65Khz. A decrease from the +\-75Khz that is broadcast now. I can tell you as a fact, some of the stations in Chicagoland actually "counter program" when it comes to how loud they sound. I know the classical stations do , an alternative rock station does and so does a jazz station. They have better fidelity, but mainly the audience is tuning in because that station offers a unique program format or personalities worth listening to. I know one of the most "bonehead" things a PD can do is go and try to turn the station up and make it sound louder. But the truth is more modulation makes an FM carrier stay off carrier frequency more and in "fringe" listening results in noise and well, the stereo pilot was lost long before the listener noticed the audio was gone! Sorry to blame the PD. But sometimes chief engineers are under pressure to sound loud. We have seen what has happened to CB radio, what with people cutting or jumping out their modulation limiters!
Because of this inexperienced "hands on" type of operation we must have the transmitters certified initially unless, if built from an available "kit form" and there are some very good ones, an actual living, breathing engineer powered the thing up and looked at it on a "scope " and spectrum analyzer and certified it by placing his name and license number on the transmitter! We should relax the certification if the transmitter is 1 watt or less. If the operator is generating spurs then it is taking away from the power on the frequency he wants so it's his loss.
If a lesser deviation is adopted I don't believe "new" technology transmitters would have to be developed. After all we are taking something away that the existing transmitters already had the capacity to deliver.
Even with this reduced deviation/bandwidth it may be possible to achieve favorable results with just 1,one subcarrier.
If some numbers could be drawn on for the licensing of stations, but some interference was bound to happen, these signal levels could be duplicated in the "lab" and a lesser modulation deviation chosen. After all it is a lesser service.
I believe the newly created stations LP1000 and LP100 should protect each other on co-channel and 1st adjacent channel. I am in favor of some small interference, there was mention of 10%, if it means that more stations will be licensed.

I am against translator or booster rebroadcasts. Not with this new service.
This 1-10Watt microradio class is a strange one. I played around with 1 watt when I hopped up a wireless microphone. This level seems little more than a big kids toy. Like one would tire of it in a year or so. Maybe then move on to something bigger and better. But then 10 watts almost gets done what I wanted to do, but with no punch! I wouldn't throw 10 watts away if that's all I had to work with.

I think 1/2 to 1 watt ought to be left to grammer schools and churchs. Yeah. Church types just love to spread the word and generally to some shut ins or people that can't get to church could still listen to their favorite pastor.
I think any grammer school should be allowed 1 watt on AM or 1/2 watt on FM. Then when they grow up they could appreciate professional radio.

On ownership and eligibility... I agree with the idea that any person with any interest in a full power broadcast station CANNOT have any ownership interest in any LPFM. I agree with the proposal on limiting multiple ownership in the SAME community. But if I am good at what I do then I would be very interested in being licensed in adjoining communities. As far as to the definition of the "market" or " community. As I mentioned earlier it is very clear where I live where your market ends and then what begins a separate and distinct market. When it is no longer convenient to take advantage of the commerce or sales in the ads. Too much travel. The listener doesn't have kids in the schools. You can go to the Ace hardware or Jewel food store or MacDonalds for that matter in your community. This "market" question could probably be found out from these franchises!

I believe the cross-ownership restriction should be extended to prohibit newspapers, cable systems, or other mass media from obtaining a license in this service. These media already have available "stacks of cash" to throw at obtaining a license. They don't need another voice where others have none.

On national ownership... I could easily find somewhere between 10 and 20 places where I could start up stations. In resort communities and the like. So maybe put the limit at 20. 5 seems too few.
I agree with #36, that there should be NO residency requirements. You don't want to run a poor broadcaster ragged do you?
#37 There should be some standards for character qualifications. We can't have someone riling up their neighbor with a license given to them by I'm sure an unbiased FCC.
#38,39,40 I'm sure a great many unlicensed pirate radio operators will be relieved when they obtain their license. As for these repeated offenders. I could see granting them a higher power license but that they must operate at a lower power until both sides feal that they said they are sorry. That public service angle. Then they could turn their facilities up to the higher power level.
#41,42 With LP1000, I think at least 20% or 1/5th of the day, with a drive time should be devoted to local programming and public interest programming. This should not be another service where someone just pulls something off the satellite and rebroadcasts it. Conversely I could see LP100 and the micro radio folks with considerable time vacant if it were just for live or local shows. The only thing that makes sense is to use sources off of a computers hard drive or off of satellite. It would be beneficial to the community to rebroadcast some programs in different dayparts. People are not on the same schedule in this 24 hour a day world.
#45 Yes make the LP1000 stations fill their airtime and be "on the air' , after all they got the golden license. The little LP100,10 &1 will probably be determined experimentally. Time will tell.
#46 I think the construction periods are practical and generous. I think applicants should be able to sell their permits. The applicant may find that the construction or radio is not for them or maybe it's boredom.
#47 This LP1000 station licensing structure should be made simpler but not be treated like some off the cuff 2nd banana license. As far as monitoring of the performance of a station. I think the quantity of complaints or praise or nothing at all will tell you if the station is performing properly. Why not have them report to the local chamber of commerce?

#48 After all the slaving I have done to get into broadcasting, then to get let go, then to finally be granted a license. Then you are telling me after I build this station and obey all of the rules, you are not going to renew my license? Are you nuts? Do you think it is some levity or cakewalk to find a tower site and erect a tower? Then you expect the new licensee to move it? How about if we tell the baker or machinist or plumber we're not going to renew his license? When the hell in this country do we take care of the working man? I have heard of stations being handed on to the next generation in a family! I had mentioned earlier that I was willing to share a frequency just so this would not be an issue. The issue that others may want to take turns at the microphone.

#49 Yes the higher power LP1000 stations should be required to adopt and utilize the EAS system.
#50 After the call sign the station should mention what community it is in or serving.
#51 I think it is most impractical to expect to be able to inspect a station "anytime" it is in operation. Especially if it is one of the LP100, 10 or 1 watt class which probably will be being run by computer overnight! During regular business hours is practical. Call and make an appointment. Although if interference is a problem then it would have to be delt with as soon as possible or sooner.
#52-56 I have no experience with electronic filing systems. But I think you should consider filing electronically AND by paper/mail. Only because I have seen colds, viruses or the flu just totally incapacitate a small operation or small business. Any filing "window" should allow for these very human people to get back on their feet. 15, that's fifteen days. This should also lessen the flooding of applicants. Would it be possible to take two votes from the mail and the electronic filing to prevent the possibility of mutually exclusive applications?
#57-59 In resolving mutually exclusive applications, I strongly object to the auction. The whole idea here is that the fledgling broadcaster does not have at his disposal the necessary funding to swing a large operation. I much more agree with the point system. This is more favorable to me because for years I have tried to work to get a signal on the air in Lockport Ill.

I remember wanting to buy an AM radio station at auction in 1985 and after making inquiries with the SBA , Small Business Administration, thier information stated " The SBA no longer loans money for broadcast properties". What are they there for?

In order to get this service to "fly", paperwork or forms needed needs to be reduced to a minimum. Reporting, recordkeeping, the necessary compliance requirements, should be streamlined. Remember if any entity doesn't satisfy EEO or pay their taxes, other agencies are going to police them and we don't need the FCC doing redundant checking-up.

Sincerely,
Frank P. Patka

Following this are excerpts from comments to 92-08..

A little history...

A letter to Radio World.
Helixing is a manufacturing concern of antennas. Principally medium wave, but also long and short wave, for the commercial market, the amateur and hobbyist. In October of 1993 I requested and was granted a "Special Temporary Authority" for trasmissions in the AM broadcast band, from the Federal Communications Commission. I beleive I needed this license, this "tool" to conduct tests. Sporadically over the years you, RW and I have sold a few antennas. I had become interested in resurrecting the antenna manufacturing business, and starting another round of testing and advertising. I requested a second license in February of 96. But much to my surprise and dismay my second request for an identical license from the FCC was met with incredible amounts of resistance, red tape and ultimately rejection. I supplied the FCC with the amendments that they required only to withhold information when it got to the point of disclosing trade secrets about MW vertical antennas with gain or wide bandwidth or shielded transmitting antennas. I was nearly accused of causing interference even before a single antenna was excited. I do not have at my disposal the funds available to hire a team of lawyers to confront the FCC. I write to you today in hopes that some other fledgling company will encounter more amiable results in a government that is supposed to serve the people.

A need...

Lockport is not being served. Spring of 97, when 11 inches of rain fell in such a short period of time, where could all the commuters turn to find that Archer Road, Route 171 was impassible. Nowhere. The State, County and local police were up to their elbows in it. It was me and hundreds upon hundreds of motorists that drove miles down an important route only to find autos under water, and have to turn around to drive miles down another road to hope it would be passible. The clear channel stations were busy trying to cope with the inundation of information of areas that were even harder hit, and the traffic. What did I want. What I want is what I need. These people needed the same thing.

A dream...

Why was I so interested in science and electronics? Was it that radio? Sure why I bet if I learn as much as I can about radio and broadcasting I would be better equipped than some other guy and I would get hired. Well as you can see that didn't work out either. While my parents were arguing long before there was 50% divorce, and drugs were becoming more prevalent, it was my interest in radio that would draw me back and keep me out of trouble. This industry wants to hire "shock jocks" and "slobs" and "perverts" and "big babies" that forgot when to grow up. This industry doesn't want to hire the responsible or the public servant. What did I want? To play some rock and roll records, do some kooky bits. Have an alternative energy show, or flying or I'm sure someone wants to do a fishing show. There are a lot of little interests out in rural America that would bore those in the big city incredibly. I wanted to open a broadcasting school like the one I attended. What a fun place that was. But I didn't want to rip anyone off on the "dream". I wanted to offer something more. At least while they were there, I wanted to have a signal. Just something that could be heard 2 miles, while we ran to lunch. What a treat.

I'm working for us...

So desparate and resourceful was I, that I approached "Media One Cable" out here so I could have a cable modulator on their system. The plan was using the 75 milliwatts out and cells spaced 3/4 to 1 1/4 miles apart, we would then exit the cable system through drops and down-converters to get on the AM band. FM could be direct or also frequency converted. Media One told me they didn't want to add any "new"? technology to their system and that they didn't have the frequency space! .027% What did I want?

I'm working for us...

About the same time I made an inquiry with Commonwealth Edison, the electric company, about obtaining a lease for some runs of leaky cable to be strung from their poles for an inductive AM transmission system. I was disappointed to hear that ComEd, will only allow companys registered with the ICC, Illinois Commerce Commission, as a "licensed telecom provider" to place cable on their poles!? Look I want to do radio not get hung up in red tape and lawyers and court.

Real life...

AM amplitude modulation on medium waves is poor. After you add gas and electric pipe, and heaven forbid aluminum or steal siding, the signal is gone. The wavelength has no penetration. Although part of communicating is listening. I'm all for having outside MW receiving antennas. It helps a lot to get away from all of the electrical interference, let alone the sheilding I just mentioned. Automobile radios on the other hand are well equipped with their additional stage of RF amplification and TRF tuned radio frequency front ends. But you drive under a little AC power wire and it's gone baby. That weak signal competing with the noise is gone. I have done a lot of tests in my time and around 8 watts is a good signal level. I don't want a lot of power. I'm not interested in hearing Dallas / Fort Worth Int'l airport here in Chicago.

FM is better...

Boy I can remember hearing 50 miliwatts 1 & 1/4 miles. Cool! You still need more power than that to service the average? community. Realize that with FM and it's VHF frequency, it will be much easier to work up some directional antennas for strange shaped geographys. FM The noise suppression is there. The penetration is there. You'll have predictable signal degradation at the end of the service area. And with a receivers AFC, you can license another community close by. I think I could do a great deal with 4 watts.

Something for the children...

Could you do us all a favor? Open the part 15 limits up to 800 milliwatts out for AM and 400 Milliwatts out for FM and let some kids have some fun? No matter how old they are?

Dear Mr. Kennard:
I hope somebody reads this. I hope you do some good. I am an old man now and have not yet realized the "dream".

Sincerely,

Frank P. Patka