

Secretary  
Federal Communications Commissio  
Washington,DC 20554

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RE: MM Docket No. 99-25, (NPRM) to establish Low Power FM stations.

The NPRM for 1,000 watt and 100 watt stations is good as proposed.  
These two classes should be licensed as COMMERCIAL

Stations under 100 watts should be NON-commercial.

The 3rd adjacent channel protections should be eliminated..  
The 2nd adjacent channel protections should be eliminated.  
The first adjacent channel protections should be adjusted to 3 db lower than the  
(50,50) of the protected contour.

LOCAL residents for Low Power fm should be preferred.  
Mutually exclusive applications should be settled by a lottery drawing. An Auction  
process would be unfair because most Low Power applicants will have limited funds.

Translators should be protected from Low Power applications..

All present Commercial Licensed FM stations that are not operating at full height and  
power for their Class should be reclassified as 73.215 stations and should not enjoy the  
protection of 73.207 .

Respectfully submitted



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April 2, 1999

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