

DOCKET FILE COPY ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

MAY 19 1999

FCC BUREAU

In the Matter of)

Creation of a Low)
Power Radio Service)

MM Docket No. 99-25

RM-9208

RM-9242

Comments of
The National Association of Radio Reading Services

The National Association of Radio Reading Services (NARRS) would like to bring to the Commission's attention a major concern with the proposal for low power FM (LPFM) stations. There are well over a hundred fifty reading services for the blind and visually impaired in the United States. Most are using subcarriers of FM stations. These subcarriers will be negatively impacted should such a plan as the LPFM go through. These stations are already serving a minority group. They serve the community where they exist by helping people who cannot read due to disabling conditions access vital information.

Sub-carriers are, in practice, fragile signals. Members of NARRS put up with a narrow bandwidth now in order to deliver services economically. If the commission allows LPFMs to begin operation on adjacent channels to the NARRS member service, major interference will occur and hundreds of listeners to that service will lose the ability to use the sub-carrier receivers loaned to them for free by the radio reading service.

No. of Copies rec'd
List ABCDE

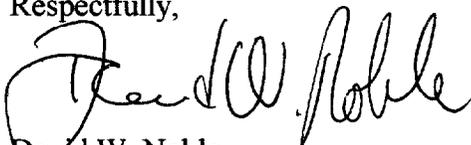
249

This is analogous to stealing the newspaper from their doorsteps, the magazine and grocery flyers from their mailboxes, and other current print material from their homes. The member services of NARRS provide a vital link - a fragile link - between the visually impaired and disabled population and the rest of the world. The LPFM proposal will only harm these services and the listeners who use them.

We have heard arguments that manufacturers of SCA receivers could "tighten" the units to reduce or eliminate the LPFM interference. This is neither practical nor a technical possibility. Increasing the selectivity of the SCA receivers introduces yet more cross talk from the main channel FM. This reduces or eliminates the usefulness of the receiver to the user, effectively shutting them off from the service.

The National Association of Radio Reading Services urges the commission to drop the LPFM proposal and look for other ways to help minorities.

Respectfully,



David W. Noble

President

National Association of Radio Reading Services

2100 Wharton Street, Suite 140

Pittsburgh, PA 15203

Submitted on: April 28, 1999