

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

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In the Matter of  
  
Creation of a Low  
Power Radio Service

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MM Docket No. 99-25  
  
RM-9208  
RM-9242

Comments of  
KJZZ-FM and KBAQ-FM

KJZZ-FM and KBAQ-FM are non-commercial, educational (NCE) stations serving metropolitan Phoenix and central Arizona. KJZZ is an NPR news/talk/jazz station wholly owned and operated by the Maricopa County Community College District (MCCCD). KJZZ also operates Sun Sounds, a radio reading service for the print disabled. KBAQ is a classical music station jointly owned by the MCCCD and Arizona State University. Both KJZZ and KBAQ are non-commercial educational (NCE) stations.

As General Manager for these broadcast operations, I am extremely concerned with the Commission proposal to create a new class of low power FM (LPFM) stations. I am told that some studies indicate metropolitan Phoenix could, under

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some scenarios, have 47 additional stations joining the airwaves. While the additional competition gives me cause for some concern, the potential for substantial interference to my stations is alarming.

KBAQ operates at an effective radiated power of 12,500 watts. This is small by any FM standards. In many areas our signal is currently susceptible to interference. We are presently unable to cover large parts of Scottsdale, which is adjacent to and part of the metro Phoenix area. If the Commission chooses to reduce interference standards to accommodate the LPFM stations, it is highly likely that some of our present listeners will lose some or all of their service.

Our radio reading service, Sun Sounds, faces an even more uncertain future. It occupies one of the sub-carriers of KJZZ. Additional stations operating closer to our main channel frequency can hardly avoid creating higher levels of interference.

As an NCE station, KJZZ has always taken its public service responsibilities seriously. We created Sun Sounds in 1979, as part of our broadcast operations. This was four years before the Commission took steps to ensure the availability of sub-carrier space for reading services. See *Amendment of Section 73.593 of the Commissions Rules, 54 RR 2d 25, 36 (1983)*; see also 47 C.F.R. §73.593. We were proud to have anticipated the Commission in this

area. When the Telecommunications Act of 1996 articulated the same outlook regarding services for the disabled (*See* 47 U.S.C. §255), we were again pleased to know our commitment to such service had been well established.

I am now somewhat confused. Congressional and Commission policy seems clear. Simply stated, telecommunication services to the disabled are important. The LPFM proposal, seeking to create opportunities for women and/or minorities, could be seen as an extension of this policy.

Knowing that, and knowing the Commission would have to reduce existing interference protection standards, it is impossible to avoid concluding that at least some of our listeners will receive a signal of poorer quality, or perhaps be totally disenfranchised. How does one avoid the feeling that the LPFM proposal could become embroiled in a "disabled versus diversity" debate?

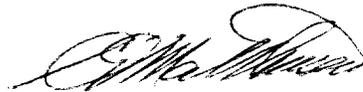
Along the same lines, I don't yet know how a new class of stations might affect the analog-to-digital transition being studied by the Commission. The In-Band, On-Channel (IBOC) proposals under consideration will likely use existing sidebands to accommodate digital transmission. Because these proposals are based on current interference standards, any change in those standards could have a serious effect on Sun Sounds and other reading services. We have devoted 20 years and thousands of hours to make our

reading service an asset to our community and state. The possibility that it could be diminished is unattractive.

In attempting to gain insight into this issue, I have been frustrated by a lack of information. I am unable to ascertain how much interference might be visited upon my classical station and my reading service if the proposal goes through. It is my understanding that some organizations, including the National Association of Broadcasters and National Public Radio, are hurriedly trying to pull some information together.

On behalf of KJZZ, KBAQ, and Sun Sounds, I must respectfully request that the Commission postpone any decision until such time as comprehensive information is available. To do otherwise would unnecessarily jeopardize the public services my stations presently provide.

Respectfully submitted,



Carl E. Matthusen  
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