

1.) Our surveys show that many of our listeners come from areas beyond the traditionally protected 60 dBu.¹ These areas lack public radio service and require listeners to employ good antennas and sensitive radios in order to receive our coverage. The proposed LPFM service will create many new stations, some of which will be licensed to the co and adjacent channels of our services. Using the Commission's U/D ratios, it is easy to determine that the presence of these new LPFM signals will cause interference to the reception of our signals. Since Iowa is largely rural with flat to gently rolling terrain, and the existing public radio stations are widely distributed, many people throughout the state are in areas where the only available public radio signal is from a station having less than a 60 dBu signal. Reception of these signals to the 40 dBu signal contour is usually adequate, *absent interference*. Therefore, we propose that if the Commission decides to establish an LPFM service that such a service, regardless of the authorized power, be "secondary" and that the provisions articulated in section 74.1204 (f.), which protect an existing stations, apply.

2.) With regard to the portion of the Commission's LPFM proposal that would remove the 2nd and/or the 3rd adjacent protections provided under current licensing. The University of Northern Iowa opposes this because we believe those protections continue to be valid. The protection ratios established by the Commission for existing stations have served us well over the years. Considering the large number of stations added to the FM band since the ratios were established and the somewhat recent approval of directional antennas for use under shortspace in the commercial band, we believe that if there were any improvements in receivers since the protection ratios were established, that such improvements would be negated by the larger number of

¹ See Iowa Public Radio coverage map attached as exhibit #A. This map also shows the unserved areas of Iowa.

stations and the less restrictive interference standards in current use. Further we urge the Commission to undertake new studies to determine the median receiver characteristics². We are amazed that the Commission would propose the elimination of 2nd and 3rd adjacent channel protections without having more than a “hunch” about the ability of modern receivers to reject co and adjacent interference.

- 3.) If the Commission establishes an LPFM service, we urge that protection be given to the *input* and the output channels of all existing translator stations. Although the Commission’s Proposed Rulemaking asked if translators should be protected, traditional thinking might consider just the output as needing protection. We believe the input of all existing translators also needs to be protected. We provide the example of the University’s FM translator station in Des Moines. Since there are no available educational reserved channels in Des Moines, the University has licensed its translator station on a commercial channel. Using the Commission’s proposed low power spacings table we have determined that, without protection to translator stations, an LPFM station can be placed on, or immediately adjacent to, our translator station’s input channel. Since our translator’s output is on a commercial channel where the Commission’s rules prohibit delivering audio from the primary station by alternative delivery, if a local LPFM were to go on the air on the input channel or immediately adjacent to it, the translator station would have no way of receiving an input signal and therefore would have to be abandoned. According to the American Research Bureau, our Des Moines translator station serves a weekly CUME audience of approximately 10,000 listeners. All of these listeners would be disenfranchised if the LPFM caused interference. Our station has a seven-year history of 24 hour NPR

² We urge the Commission to involve its own laboratories and those of private researchers so that the best possible results can be achieved.

service to the Des Moines market. ***Whatever the Commission's reason is for establishing this new service, we do not believe that an established public service translator, having a broadly educational mission with a long record of distinguished service, should be forced off the air.***

4.) The University also operates a translator station in Dubuque. In this area of Iowa there is no local public radio station and our translator has provided the first service of its kind. Since the Mississippi River travels through downtown Dubuque the area has a significantly depressed elevation. Without translator service the downtown area would not be able to receive a public radio station. Over the years we have invested funds in new equipment to keep the Dubuque translator up-to-date. Our listeners in the area have enjoyed a long history of high quality cultural and informational programming. All this will be in great jeopardy under the Commission's new LPFM proposal if our translator input and output channels are not protected. Once again, we feel strongly that the Commission should not issue a construction permit to any LPFM station that would interfere with the input or output of any existing translator. *If the Commission decides to create the LPFM service and an applicant applies for a channel that would interfere with the input of an existing translator, we suggest that, as an alternative, the Commission give the translator operator the choice of employing alternative delivery of audio to the translator or to decline the interference which would force the LPFM operator to find another channel.*

5.) For the reasons expressed above, we believe that the FCC's LPFM proposal places all five of our operating translators in jeopardy. In addition to the Des Moines and Dubuque translators discussed above

we have other translators located in Mason City, Davenport and Eldridge, Iowa.

We understand the Commission's desire to create a new service that will alleviate the pressure it faces from radio pirates who illegally use the airwaves and from legitimate minority and affinity groups who desire their own voices. However, it seems wholly inappropriate for these new services to be started at the expense of well established and productive FM translators and public radio transmitters which pioneered original public radio service and which continue to serve with the utmost highest quality.



Robert Koob, President, May 4 '99
University of Northern Iowa.

