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Before the Federal Communications Commission
Washington, D. C.

In the matter of
Proposal for creation of LPFM Service
MM Docket 99-25
Comments of Clarence E. Jones

MAY 27 1999
FCC INTL ROOM

I urge the commission to allow both commercial and non-commercial low power fm facilities.

I urge dropping of the 2nd AND 3rd adjacent channel restrictions. Improvement in fm receiver design makes this restriction moot. In addition, I urge dropping the proposal for 1000 watt fm's. This IS NOT low powerfm. There will be no interference if there are only two classes of LPFM's, 1 to 10 watts and 11 to 100 watts facilities.

By keeping lpfm's to a maximum of 100 watts this will keep out the "fat cats" with access to unlimited money machines. Nobody needs fm's over 100 watts in this proceeding, and a maximum of 199 ft tower height.

No sub-carriers are needed --- only for stereo operation. For newstalk, mono should be allowed.

There should be a 50 mile limit on the lpfm owners residence, using coordinates of their home address and coordinates of the lpfm.

No auctions. Use first come first served. Bidding only serves to destroy the "little man" theory to own a lpfm.

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No non-commercial only lpfm's. We will not accept this. Many of us are retired and must use selling of low cost air time to make lpfm viable. Allow both commercial and non-commercial.

The NAB's claim of interference is only a smoke screen. Over 460 full power fm's are operating on 2nd and 3rd adjacent channels as short spaced fm's with no interference. Furthermore, allowing only 1 to 100 watt facilities would take the wind out of the NAB's sails. (see FCC 97-276, August 8th, 1997)

FCC fees for applications and for licensing should be reasonable and in line with what you will license, low power fm.

In accordance with proposed fcc 2nd and 3rd adjacent interference contours, most small cities and towns will not be able to receive any low power fm service at all. Santee, SC, population 1891 (90), at 33.483533 NL and 80.480498 WL shows channel 220 91.9, 270 101.9, 290 105.9 and 296 107.1. NOT AVAILABLE UNDER FCC RULES. Ellore, SC pop 939, could possibly use 10 watts at 264, 100.7. My town, St George SC, pop 6940 (90) at 33.184532 NL and 80.573246 WL, shows 205, 88.9, 220, 91.9, 253, 98.5, 270, 101.9, and 296, 107.1, and NONE ARE AVAILABLE UNDER FCC RULES. Using no 1000 watt facilities, and using 1 to 100 watts without 2nd and 3rd adjacent, this town could have a lpfm.

If a lpfm goes silent for a period of 90 days, the license should be forfeited so another could apply and operate the facility. There should be no minimum daily time that a lpfm should be operated.

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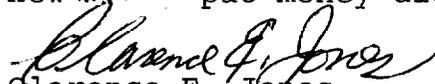
LPFM's should not be required to participate in what is left of the troublesome EBS plan. Doesn't work now for the big boys, and won't ever work correctly. It is not necessary for LPFM's.

The FCC should allow permittees to build their own 1 to 100 watt fm exciters and power amplifiers. There are many designs now posted on the internet that far surpasses what Harris, CCA (now defunct), and any of the other commercial plants put out.

Ownership should be limited to ONE low power fm. No exceptions.

In closing I am a National Association of Radio and Telecommunicationsretired engineer, in bro dcasting profession for over 45 years, and hold an fcc lifetime license, although that doesn't mean anything anymore. The NAB lobbieists have created a corporate jungle mess in am fm broadcasting. In Charleston SC there remains only ONE sole proprietorship, an fm facility---all others (around 30) are licensed to about 3 corporate owners, called mega groups with nothing to say --- just jam as many commercials into an hour as you can. LPFM should be used for creation of local expression and service by small businessmen and nobody can own more than one.

Don't liste to those "political cowboys" who call themselves senators and representatives, but who in reality work for the NAB. How ^{MUCH} pac money did they get from NAB? Let LPFM have a chance.


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