

Office of the Secretary  
Federal Communications Commission  
The Portals  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Subject:  
Proposal for Creation of the Low Power FM  
(LPFM) Broadcast Service  
Docket No. MM 99-25

7 June, 1999

Comments of Michael John Muehlbauer

Dear Federal Communications Commission:

I am writing to support the proposal of rule making set forth on January 28, 1999 for the creation of a LP-1000, LP-100, and the "Microradio" low power broadcast services.

I believe that these types service can coincide with existing licensed broadcasters and provide local communities and groups access to the public forum of broadcast radio.

I support the following items within a new structure:

1. The service should allow for "commercial" as well as "non-commercial" stations, however not determined by a license class.
2. Both the 2nd and 3rd adjacent channel restrictions should be dropped for LP-100 and Microradion stations, however 2nd adjacent channels maintained for the higher ERP stations of the LP-1000.
3. Use of a "prohibited contour overlap" method of predicting interference.
4. The proposed 60 meter (197 feet) limitation on Class LP-1000 primary stations, as well as the limitation of the LP-100 secondary stations.
5. The service must not be subjected to a narrower bandwidth (or sub-carriers) than existing licenses/stations or "digital only" broadcasting.
6. A form of ownership restrictions should be in place to keep this service for local owners/communities, and not "out of town" or large conglomerates. Local ownership for Local broadcasts.
7. Microradio service regulations, to insure transmitting equipment does not produce interference with other licensed services. This license regulations should be similar to that of amateur radio regulations for unwanted emissions.

I do however oppose the "minimum distance" limitation for "Microradio" license, as these stations will be at a very low power level and will most likely not operate for 24 hours a day 7 days a week. This restriction will seriously limit the number of stations that can operate in a given community and seriously overextend the application process through unnecessary study and analysis.

Sincerely,  
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