



# City of Seattle

Paul Schell, Mayor

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## Executive Services Department

Dwight D. Dively, Director

June 1, 1999

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**BY HAND**

Ms. Magalie Roman Salas  
Secretary  
Office of the Secretary  
TW-A306  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20054

Re: **Creation of Low Power Radio Service (MM Dkt. No. 99-25)**

Dear Ms. Roman Salas:

Please find enclosed the original and nine copies of the comments of the Citizens Telecommunications and Technology Advisory Board<sup>1</sup> of the City of Seattle in response to the Notice of Proposed Rulemaking in response to the above-referenced proceeding.

Please contact the undersigned if you have any questions or comments regarding this filing.

Sincerely,

Gary Low  
Citizens Telecommunications and Technology  
Advisory Board of the City of Seattle  
12<sup>th</sup> Floor, Alaska Building  
618 2<sup>nd</sup> Avenue  
Seattle, Washington 98104  
(206) 684-8498

Enclosures

<sup>1</sup> The Citizens Telecommunications and Technology Advisory Board is a 15 member Board whose purpose is to advise the Mayor and City Council on issues of community-wide interest relating to telecommunications and technology. The comments expressed in this letter, therefore, are those of the Board and do not represent the views of the Mayor or the City Council.

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democracy, therefore, depends on community access to information and culture and that access is only genuinely achieved when there exist communications media that are non-commercial, accessible, based in and responsive to the diverse local forces which characterize every community.

To support this vision, we urge you to legalize micro-radio with the following concerns in mind:

1. There should be COMPLETELY NON-COMMERCIAL SERVICE. The current radio spectrum is dominated by commercial media. LPFM licenses should go to those who want to use radio to communicate, not to make a profit.

2. Licenses should be held locally, limited to one per license holder, affordable to all communities, easy to apply for, and should be for non-commercial programming.

3. Power levels should go up to, but not exceed, 100 watts in urban areas; 250 watts in rural areas - NO NEW 1,000 watt stations.

4. NO secondary status for low power FM. This ensures that LPFM stations would not get bumped from their assigned frequency by higher-powered, better-financed stations at a later date.

5. Micro-broadcast pioneers who have suffered government seizure and fines should be forgiven, have their property returned, and be prioritized for new licenses.

6. Problems, technical or otherwise, should be referred to the local voluntary micro-radio organization for assistance or mediation (e.g. the successful amateur radio model). The FCC should be brought in as the last resort.

7. Low Power FM must be included in the future of the emerging digital radio technology .

8. If the FCC intends to license some commercial stations, they must be licensed last. In this instance, there should be a two (2) year "head start" for non-commercial licenses.

For the reasons set forth herein, the Commission should adopt low power FM radio service rules that include the foregoing requirements.

Respectfully submitted,

**CITIZENS TELECOMMUNICATIONS AND  
TECHNOLOGY ADVISORY BOARD OF  
THE CITY OF SEATTLE**



Gary Low  
Chair

Citizens Telecommunications and  
Technology Advisory Board of the City of Seattle  
12<sup>th</sup> Floor, Alaska Building  
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DATED: June 1, 1999