

I just wanted to make a few points & keep it brief.

1. Treat LP1000 stations the same as higher powered stations.
2. Require type accepted transmitting equipment on LP100 stations.
3. Do not require type accepted equipment on 10w or below but require they do operate without interference to other stations and within legal modulation limits, same goes for LP100.
4. Have 3 classes of stations;
 1. First: LP1000 and up.
 2. Second: LP100 & LP translators from regional stations.
 3. Third: Satellite fed translators from stations or networks out of the region and 10watt or less stations.
5. Something needs to be done to prevent LPFM from becoming just another satellite repeater for a large network and situations where a local person or group holds the license and just streams ONE networks programming, ie the AFR, or BBN model.
6. Continue the commercial & non-commercial model we now have.
7. Drop the second adjacent protection on LP100, how much of an area can a 100watt station blanket or cause problems, even on cheap radios? I think we'd count in in feet, not miles.

Additional comments;

Please don't let the "big city" broadcasters control the outcome of this decision based on how things are where they are. There is a large number of small towns & mid-sized cities where there is plenty of spectrum and a need for local radio without the high cost that is associated with acquiring AND operating a typical radio station under the current rules. Due to these high costs many owners are forced to "go satellite" and thus we have lost localism in many places.

I STRONGLY DISAGREE with the NAB's statement that with consolidation we have more diverse programming available and now that a group has many stations they will experiment more. What I've seen is the opposite such as a group having 2 country stations in a market just to keep someone else from doing country. Another typical practice is for an owner to put on the SAME format to split the ratings numbers of a dominant station.

Just look at the percentage of music that is available in any record store that is played on radio and tell me we have diversity. The innovations in radio almost come from the bottom and if we don't have a thriving "underculture" we are doomed to mediocre.

Thank you for allowing me to comment.

