

I have been involved in radio broadcasting for approximately seventeen years as General Manager, Station Manager, and/or Operations Director of several stations licensed by the Commission including KMSM-FM, Rolla, MO; KGNN-AM/FM, Cuba, MO; and KGNV-FM, Washington, MO. I am a member of the Society of Broadcast Engineers, National Religious Broadcasters (through my current ministry), and the Gospel Music Association.

These comments are mine only and do not necessarily represent the viewpoints of any organization with which I am affiliated.

I agree that the Commission should create rules authorizing a Low Power FM Radio Service. These comments follow the outline of the Notice of Proposed Rule Making:

### III. SERVICE PROPOSALS AND ISSUE ANALYSIS

#### A. Need for Low Power Radio Service

The liberalization of ownership rules has narrowed the diversity of voices. In one local market the Christian Contemporary Music format is no longer heard because the station carrying the format was sold to an ownership holding the licenses of several stations who changed the format. National and regional group ownerships like the American Family Association and the New Life Evangelistic Center have aggressively farmed available channels. Local organizations interested in purchasing stations to restore removed formats have not been successful because of the cost of existing stations and the lack of new channels under the current interference regulations.

#### B. Spectrum Considerations

I have studied perhaps sixty large markets. In only one instance did I find space for a LP1000 station in the reserved portion of the band. The studies were based on removing interference protection only from the third adjacent channels. In order to assure that candidates for noncommercial stations are benefited from a Low Power FM Radio Service, the Commission must allow noncommercial stations in the unreserved portion.

The Commission writes, "In considering new classes of FM radio service, we are inclined, at a minimum, to continue the noncommercial educational channel

reservation with respect to any new stations that would have a preclusive effect on the operation of full power stations in the reserved band, such as the primary low power stations discussed below." This sentence is difficult to interpret. If it means that LP1000 stations would not be allowed in the restricted band, I would disagree. The one thousand-watt power level is needed to cover enough audience whose gifts would fund worthy programming.

Low Power FM stations should have access to auxiliary broadcast frequencies on the same basis as Full Power Stations. Otherwise, LPFM stations might be forced to depend on more expensive analog or digital links provided by telephone companies. This would work against the goal of bringing in diverse voices who are not as well funded as the owners of Full Power Stations.

#### C. Technical Overview of LPFM Services

I would suggest that once a successful candidate for a LP1000 station has been selected via the e-mail process that he/she be allowed, via the application for Construction Permit, to request a power level as high as six thousand-watts and a directional antenna if this is possible without exceeding the LPFM interference standards. This would allow greater public service by more efficiently utilizing spectrum and it would allow a larger audience and the resulting increase in public service and financial support. There is a hint in the NPRM that the Commission would allow increases later. However, the later changing of transmitters, transmission lines, and antennas would increase the cost for the licensees.

I agree that LP1000 stations should be primary stations with precedence over translators. Local stations offer greater local public service than translators rebroadcasting distant stations. Translators, for this reason, should not be grandfathered. Booster stations reinforce the signals of stations which, except for some extraordinary problem, should have covered the area. LP1000 stations should be able to utilize this remedy for similar coverage problems. LP1000 stations should also be allowed translators. If a community with such a translator wishes to replace it with a Full Power or LPFM station, they would have that ability if translators are secondary services.

I urge the Commission not to allow the issuance of LPFM rules to be impeded by the controversy associated with potential interference to IBOC signals from the removal of second channel interference protection. I suggest the Commission immediately issue rules allowing LPFM stations through dropping third adjacent channel protection and leave the second adjacent channel question for a later time when an answer is clearer.

If the Commission authorizes LP100 and microradio stations, they should be a secondary service given the special considerations proposed and because they would provide service to smaller numbers of listeners than Full Power and LP1000 stations.

#### D. Interference Protection Criteria

Comments on some of this material have already been made above.

LPFM stations should be protected from other LPFM stations in the same way LPFM stations would protect Full Power Stations. Otherwise, the stations may not be able to be IBOC compatible.

#### E. LPFM Emissions and Bandwidth

The Commission is urged not to reduce the spectral emission mask for LPFM stations relative to Full Power Stations. This could increase the cost of transmission equipment because unmodified standard broadcast equipment could not be used. Reduced bandwidth could handicap LPFM stations by reducing income from SCA channels (e.g., a religious station might not be able to broadcast the Sonshine Radio Network, a children's ministry, on SCA) and producing what listeners may believe is a poor quality signal.

#### F. Ownership and Eligibility

The Commission should not allow entities with attributable interest in any radio or television station to have a LPFM station. If the Commission

allows such an entity to have a LPFM station in a market which it had not yet entered, the LPFM principle of local ownership would be thwarted.

If the Commission allows commercial LPFM stations, care should be taken not to have mutually exclusive applications since auctions would cause licenses to be kept from candidates not having unlimited finances.

Since there should be more voices in the market, LPFM licenses should not be awarded to other media (e.g., newspapers, cable systems, television stations).

Since LPFM stations cover small areas, the definition of "market" should not be large geographical areas. I propose that a single owner not have multiple LPFM stations whose 1 mv/m contours overlap. There could be recurring and non-recurring efficiencies when one licensee is allowed multiple stations in close proximity which would help station successfully pay their obligations. Similarly, cooperative arrangements between LPFM stations and national ownership could help keep operations more efficient. I recommend a limit of not less than ten stations.

Disregard for the Commission's regulations is demonstrated even by unlicensed operators who cease operating once the Commission contacts them. All unlicensed operators should be deemed unsuitable to be LPFM licensees.

#### G. Service Characteristics

Call letters similar to Full Power stations should be assigned to LPFM stations. Otherwise the work of rating services and fund-raisers could be impeded.

#### H. Applications

The Commission should be commended for its proposal to use an e-mail system designed to minimize mutual exclusiveness.

I notice that there are between 950 and 1,000 comments which have been filed on this issue at the time these comments were prepared. This is historic and I hope the Commission will find no need to further extend the comment period.

Kenneth W. Bowles