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Before the
Federal Communications Commission
Washington, D.C. 20554

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In the Matter of
Low Power FM Proposed)
Rulemaking) Docket No. MM 99-25

COMMENTS OF

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I file these comments on July 10, 1999 in regards to FCC Docket No. MM 99-25. I support the concept of Low Power FM Radio Broadcasting and the ideas put forth in RM-9242. LPFM is needed, regardless of what form it takes. Let us lay a foundation of consensus and then decide on the details.

I. Radio broadcasting in America has become regional and homogenous, with little regard to serving the public interest. Mostly due to high debt loads, these operators are beholden to their bankers, consultants, and investors. Not to the general public. Especially in the top 100 markets where most of us live, many stations have regionalized their news product and other programming content. However, how can we expect such stations to satisfy each and every constituency? It's an impossible task, and one in which these operators cannot perform. And I would suggest this is just fine. Let them play "nine in a row". Let them air toilet trash talk radio. Howard Stern....keep up your good work. You see, their charter was never to air high school sports, local public service announcements, or community debates on serious local issues. No. Those full power stations are too powerful. They're regional in nature and there's no denying it.

II. Access and Ownership:

The public is being deprived by diverse local views. Limit ownership to just one

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LPFM station per individual or group. I agree with the 50-mile rule. It would be better if the applicant lived within the stations 54 dbu contour.

Types of Service:

LPFM-1000: I'd like to see a higher HAAT to make the service more commercially viable. More importantly, this service shall be primary in nature. Thus the higher recommended HAAT.

LPFM-100: This service shall be secondary, yet promises to be the "workhorse" of the LPFM service.

A further note and discussion should be given to existing Class D educational stations in the LPFM-100 proposal. Many Class D's could not change class back in the FCC order in 1979, yet these stations have given years of excellent service to their respective communities. My own high school Class D station will be celebrating it's 30 year birthday next year! Class D stations must be given the opportunity to upgrade class to LPFM-100 as part of this rulemaking. And they must have top priority, as well. As long as no additional interference is caused to other stations by the upgrade, the commission should allow these "granddaddy" stations to increase power to 100 watts, regardless of additional interference from adjacent channels and current HAAT.

The LPFM-10 watt or "microradio" class is more problematic. And in light my experiences operating two 10 watt Class D non-commercial stations, I oppose any LPFM-10 proposals unless the applicant is a school distict, college, public co-op, or Indian Tribe. I do not question the integrity or enthusiasm of microradio proponents. I question the durability of such a service. Year in, year out, the LPFM-10 station must provide continuous service to their respective communities. There must be accountability and financial resources, making the service durable. No individuals will be allowed to apply for this type of service. A board of directors of varied ages and experience will be required to be set up for each LPFM-10 station. This class shall be non-commercial and have an input power of no less than 10 watts.

Commercial vs. Non-commercial:

LPFM-1000 and LPFM-100 watt service should be given the authority to operate as a commercial station. However, the non-commercial applicant shall study the reserved band first before choosing an appropriate channel.

In many areas, even a 100 watt station may prove financially viable. It is not the government who shall decide if an applicant stays in business. Let the market decide.

Local and Distant Translators:

Distant translators, those that are located beyond the primary station's 60 dbu contour shall be subject to "bumping" by any class of LPFM applicant. Local service is preferred and needed.

Local Translators' frequencies should not be available to the LPFM applicant, except for a LPFM 1000 watt primary service. In many areas of the country, hilly terrain complicates FM reception. Local translators provide "fill" where it is needed, within the stations' 60 dbu contour.

Interference Protection:

I support the abolishment of the 2nd and 3rd adjacent channel restrictions. Unless there is a compelling engineering objection, this removal would create many more opportunites for the LPFM proposed service. The new digital technology of In-Band-On-Channel (IBOC) is exciting and long awaited. LPFM shall not preclude the establishment of IBOC.

However, my understanding is that IBOC will require the use of not only the outer edges of the designated channel, but also requiring part of both sides of the first adjacent channel as well. No! This shall not be allowed. The original intent of each stations' 200 khz channel was always to **remain on the centerline of its' designated frequency**, with as little deviation as possible. For IBOC, in a digital setting where frequency stabilization is even more precise, to require the use of the 1st adjacent channel because they are now using the *edges* of their designated channel is a clear bastardization of the FCC rules regarding frequency departure (FCC part 73.310).

SCA subcarriers shall not be available to any class of LPFM service.

Intermediate frequency protection (IF) shall only apply to LPFM-1000 watt primary stations. All other classes shall be excluded.

FINAL COMMENTS:

Low Power FM broadcasting is needed and must be adopted. Applicants must be serious and educated on the costs of running such a broadcast service. The government shall not protect other stations from competition. Indeed, it is hoped that the larger class FM stations shall take note of this NPRM, and endeavor to

provide more local and thought-provoking programming. This will hopefully create a more educated and responsive society. I look forward to a successful conclusion of the LPFM NPRM Docket No. MM-9925!

Respectfully submitted,

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July 10, 1999