July 27, 1999

The Honorable William E. Kennard
Chairman, Federal Communications Commission
425 12th Street, SW
Washington, DC 20544

Re: MM Docket No. 99-25

Dear Chairman Kennard:

Pursuant to a Notice of Proposed Rule Making (FCC MM Docket No. 99-25), public radio station WUOT, licensed to the University of Tennessee, respectfully submits the following comment
Surely the FCC is aware of the significant impact the conversion to digital broadcasting will have on each and every radio station in the country. WUOT staff has been planning, as best we can, to set aside adequate financial resources to ensure WUOT listeners will continue to be served with a quality public radio service in the new digital age. This kind of planning and budgeting have indeed been challenging since digital standards for radio have yet to be determined. There is still so much we do not know about digital radio. The actual effect of LPFM on digital is now unknown and will continue to be until radio has indeed fully converted to digital. WUOT requests that the FCC wait until after the full implementation of digital radio before proceeding with LPFM. It is our understanding that the FCC has indicated that it won't jeopardize digital radio with LPFM. The prudent course of action would be to delay LPFM rulemaking until the industry has fully converted to digital --- at the very least, until after the establishment of digital standards.

In addition to our concerns about how LPFM could affect digital radio, we are also concerned that LPFM could jeopardize service to listeners who live outside WUOT's 1-millivolt contour. Currently, some WUOT listeners in North Carolina are complaining about on-frequency interference from a recently activated translator service. While engineering studies indicated interference was not likely, in reality, interference IS occurring. We shudder to think what "real world" interference problems will occur if LPFM proceeds on its current course.

To move forward without more technical studies is imprudent. From what little study has been done, it appears that in its current form, LPFM is not spectrally efficient. Elimination of 2nd and 3rd adjacent protection could create chaos in the FM band. More engineering studies should be pursued before potentially damaging existing stations' ability to deliver quality signals. "Static" up and down the dial appears to be a real possibility – a situation which would serve no one.

WUOT commends the intent of LPFM. However, the current configuration does not appear to be the best way to implement the kind of service the FCC envisions. WUOT is confident that with additional time and study, the FCC will find a more viable option --- one which will serve local communities while maintaining the technical integrity of stations like WUOT, which has been serving its community for half a century.

Sincerely,

Regina N. Dean
Executive Director
WUOT FM
University of Tennessee