

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

In the matter of)	
)	MM Docket No. 99-25
)	
Creation of a Low Power Radio Service)	RM-9208
)	RM-9242
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COMMENTS OF CLAUDIO LISMAN

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1) Overview: It is my opinion that the Low Power FM (LPFM) service will provide a community oriented service to a specific group or neighborhood. The LPFM service will augment the current Full Service FM station by being much more accessible to the local community that it serves. The larger LPFM stations should be able to be self supporting from advertising base of the surrounding community. To prevent large networks of the LPFM stations from being formed, thus eliminating the local community aspect of station operation and programing, it is recommended that the Commission limit the number of stations any one person/entity can own. All LPFM stations be considered commercial operations and be allowed to operate anywhere in the FM band. Test show that the protection of the second and third adjacent channel is not needed. The Commission must insist that all LPFM transmitters be Type Accepted before they can be operated on the air. Finally, the Commission needs to consider enforcement of the rules adopted as applied to the AMicroradio stations proposed in this docket . This concern arises from the activity of your Compliance and Information Bureau and their continuing attempts to shut down the current groups of pirate broadcasters.

Need for a low power service:

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2) A review of the current status of the FM broadcast industry, indicates that large companies like Clear Channels, Chancellor, CBS, Cap Star, Jacor and others, have bought multiple stations in the same market. (See Attached Analysis) Many times these stations facilities are consolidated into one studio and one business office with little if any local input from the community that is served by the specific station. Some of these stations may receive most of their programming from a common satellite feed, thus there is little individualism at such a station. There is little possibility of a local person or entity purchasing one of these stations as the cost is usually several million to hundreds of millions of dollars, especially in the major markets. Establishing a LPFM service will allow others who don't have the deep pockets, like the chain broadcasters have, access to the FM broadcast band in each market. Another advantage will be allowing minorities access to the airwaves. Most stations in major metropolitan areas target a broad segment of the population with their programming. These segments of the population are usually based on age and not on ethnic groups. Often times a minority group is not large enough or its population is not dispersed through out the community for a major broadcaster to provide special programming. The proposed LPFM stations will go a long way to answer this need. Most minority group members reside near other like minority group members. Thus small communities of minorities are formed within the larger community. The LPFM station as proposed is ideal for addressing the needs of these minority groups.

3) Your comparison to the internet broadcaster is some what invalid, while the internet allows a

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person or entity to supply a similar broadcast service, it takes more than a 10 dollar receiver for the listener to access that internet service. Currently the cheapest access device to the internet is A Web-TV≡ which still costs around 100 dollars for the necessary equipment plus the monthly fee which must be paid to a internet access company. The audio quality of the programing is inferior to that of a FM broadcast station and the internet broadcasts cannot be received in vehicles or portable receivers like the FM broadcast station. Therefore there is no real comparison between a Broadcast Station and a internet site that broadcasts programing.

4) LP100 and LP1000 stations with their proposed service areas should be able to be supported by the community businesses.

Spectrum Considerations:

5) It is realized that there is no new radio spectrum available for this proposed service, and with careful placement there doesn=t need to be. Tuning across the FM band in any city in the US, one finds many blank spots which could be filled by the LPFM stations. Many of these are currently being used by the pirate station operators that the Commission is now spending a lot of time pursuing. Since the allocations for FM stations is different in each market, then the frequencies for the LPFM stations will have to be adapted for each community to comply with the interference criteria set by the decisions made in this docket. Your assessment of the potential interference problem that would be caused by allowing the low power stations in the

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AM band is correct. The AM band is very congested and has a inferior audio quality to that of the FM band. Adding low power stations would only add to the congestion. The FM band is the best place for this kind of operation primarily due to the limited propagation at the FM frequencies.

6) As you note the FM band is divided into the non-commercial and commercial band, it is recommended that operation of LPFM stations be considered commercial and have access to the entire band.

7) It is not recommended that all LPFM stations be non-commercial, the LP1000 and LP100 stations service area should be large enough to generate sufficient advertising revenue to support the station on a commercial basis.

8) It is recommended that only LPFM primary stations be allowed access to the broadcast auxiliary frequencies. Since the smaller stations are community oriented, their studios and transmitters should be located at the same site thus allowing access to the neighborhood around the stations. Additionally this will prevent networks of specialized programers from dominating the spectrum with their stations which could be programed by satellite feeds and not provide local access.

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Spectrum Priority:

9) Because the LPFM service is new to the broadcast industry, it is suggested that all full power stations currently ON THE AIR on the date that this docket is adopted, will retain the right to modify their facilities including upgrading to a higher class in spite of any new primary LPFM stations that result from adoption of this docket. This should be made a condition on the license for any primary LPFM station. It is believed that current full power stations that have not already upgraded their facilities will be few. Most stations up graded in response to Docket 80-90 when it was adopted. Should a full power station upgrade or modify its station in any way, Any interference experienced by the full power station or the LPFM station should be documented by actual engineering measurements and an attempt should be made to resolve the problem between the parties affected before being brought to the Commission for resolution.

Technical Overview of LPFM Services:

10) The three proposed classes of stations represent a good compromise for what the Commission is attempting to accomplish. The advisability of the A Microradio ≡ stations in relation to the Commission=s ability to enforce the proposed rules is questioned. It seems that a lot of the Compliance and Information Bureau=s time is being spent shutting down and seizing the equipment of the current crop of pirate broadcaster.

1000 Watt Primary Service(ΔLP1000")

11) It is recommend that this service should be considered commercial and have access to all the available frequencies in the FM Broadcast band based on the interference criteria adopted as a result of this docket.

12) There are several reasons to believe that a LPFM station can be supported by advertising. As has been empathized earlier in these comments, the LPFM service is envisioned as being community oriented and most likely locally owned. Since small business depend on the neighborhood around their business location for most of their customers, they advertize heavily in the surrounding neighborhood to increase the number of customers. A LPFM station is ideal for this type of advertising with its signal concentrated in the community around the station. Additionally, a LPFM station with its limited service area will not be able to charge as much for advertising time as a full power station, thus a small business will be better able to afford advertising time on the LPFM than on a full power station. Finally if the LPFM station is locally owned, the small business owner will be more comfortable dealing with a neighbor than some national corporation.

13) The parameters for the LP1000 station, 1000 Watts ERP and up to 60 Meters HAAT, is a great compromise. With the adoption of the recommendation of no protection for the second and third adjacent channels, will allow many more stations into the major metropolitan markets

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which currently can not accommodate a class A station under the present rules. With the proposed parameters, there should be a large enough service area so the station can support itself from advertising. A higher power would add a little more coverage but might limit the number of stations allowed because of the interference potential to other LPFM and full power stations. Likewise, a increase in the HAAT might also limit the number of stations due to the potential for interference and trigger FAA requirements. Not having to obtain FAA clearance for the antenna height is a great money and time saver.

14) Since there will be a limited number of the LP1000 stations in each market, your proposal for minium power of 500 Watts ERP only goes part of the way in insuring that a station licensed in this class provides the expected service area coverage. It is suggested that in addition to the minium ERP a minium HAAT of 30 meters be adopted. If a minium ERP and HAAT are not adopted, frequencies could be occupied by operators who are not providing an adequate service area and thus not providing the service that the community deserves. Under the full power rules, stations must provide a city grade service contour over their city of license. Thus under the LP1000 rules, some minium service area needs to be imposed to prevent operators from obtaining a license and then not providing adequate service to the community on that frequency.

15) Providing protection to other LP1000 IF frequencies is not necessary as the occurrence of

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two LP1000 stations being separated by the 53 or 54 channels is slim to none.

16) The Commission's proposal to afford the LP1000 primary status is totally supported. As discussed earlier in these comments, it is recommended that current licensed Full Power stations would not be prevented from modifying their facilities by a LP1000, but all other aspects of primary status should apply. LP1000 stations should receive protection from Translator and Booster stations, otherwise their access to the FM spectrum will be severely limited. Translator and Booster stations have always been considered a secondary service and should remain so. Concerning the proposed digital transmission technology systems which may be installed at full power stations, should the LP1000 suffer destructive interference, the LP1000 would have to remedy this problem. Since this new digital technology would be considered a modification to currently licensed full power FM stations operation, the LP1000 will have to take corrective measures if harmful interference is received or caused. There appears no reason to allow a LP1000 to use a translator or booster station. These stations are designed to cover a small area, thus, there seems no reason to allow the service area to be augmented by use of a translator or booster station.

100 Watt Secondary Service (ALP100")

17) The Commission's proposed parameters for this class of station with its limits will make it

Comments of Claudio Lisman continued

less expensive to construct and operate than the LP1000 station. The station transmitter and antenna will cost less than the LP1000 station, and if the requirement for modulation limiting being included in the transmitter is adopted, the additional cost for a modulation monitor will be eliminated. Additionally since these stations have such a limited service area, not requiring participation in the EAS system will also reduce cost. Finally not having required hours of operation will eliminate the need to be on the air for a fixed period of time, thus reducing personnel costs.

18) Many uses can be envisioned for this class of station, including small business that would like to provide a service to their customers in the neighborhood, Community Groups who want to keep the community informed as to what is going on in the community(information that may not be of interest to persons outside the specific local community), educational entities who could provide classes and other educational information to the local community(i.e. local schools, churches, Youth organizations) and the private broadcaster who just wants to get on the air and provide a alternative program for the local community.

19) The proposed parameters will allow many to apply for and construct this class of station. It is recommended that a minium power of 50 Watts ERP and a minium HAAT of 20 meters should be adopted. This will prevent a licensee from tying up a frequency with a substandard station, thus preventing others who would provide a better service from obtaining access to the

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frequency.

20) As a secondary service, it is recommended that the LP100 station protect the IF frequency of the LP1000 stations. The location could be in close proximity with a LP1000 and with a larger number of LP100 stations the possibility of causing this type of interference is greater.

21) The LP100 stations should be treated as translator or booster stations and the applicable interference protection criteria should be applied. Use of translator or booster stations to rebroadcast LP100 stations should be prohibited. The whole concept of the LPFM service is localism, thus there is no need to expand the service areas.

1-10 Watt Secondary Service (AMicroradio)

22) This proposed class of station while it may provide a outlet for many want-to-be broadcasters, there is a great concern as to how the Commission is going to enforce the regulations for this class of station.

23) A review of the efforts over the past year by your Compliance and Information Bureau indicates that there are many pirate FM broadcasters operating stations which are similar to this proposed class. Activity in the South Florida area has resulted in over 32 of these pirate stations

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being shut down and the equipment seized.

24) Aside from the above concern, there is a need for this type of station. This class of station will be a great vehicle for local religious and educational groups that want to get information out to the neighborhood and to the individual that just wants to get on the air and provide a alternative program source. The idea of non-commercial or commercial station is not practical at this size and should not be a consideration. Additionally limiting these stations to one part of the FM band is additionally not practical. Since these stations will be secondary to all other LPFM stations, there is no need to limit where in the FM band they operate. All transmitters used at this class of station MUST be approved under the Commission=s equipment approval program. This is very important as most licensee=s will not have the required technical knowledge to adequately set up the transmitter and insure that it complies with the Commission=s rules and regulations. The last thing that any one wants to do is to interfere with the Air Traffic Control frequencies.

Since the Micro-stations are secondary, there should be no cause for concern from the full power broadcaster converting to the digital transmissions. Any interference should be documented and referred to the micro-station licensee for resolution before being forwarded to the FCC so action can be taken against the Micro-station.

Interference Protection Criteria

25) The Commission's use of the fixed mileage separation distances in the FM band, while an efficient method to issue licenses, has greatly frustrated many who believe that new stations could be operated in areas which would comply with the desired to un-desired signal strength ratio methodology, but are prohibited by the minimum fixed mileage tables. The fixed mileage methodology when applied to any class of station only assumes that the station is operating at the maximum power and HAAT of that class, this causes protection to be afforded to stations that are operating at values that are less than the maximum for the specific class. The Commission has recently discovered that many class C stations are operating with less than maximum facilities and has on its own motion issued the Notice of proposed Rule Making and Order, Docket # 98-117 which proposes to divide class C into two or more additional classes to better reflect the actual station operation. A typical example involves a class C station which is operating at 100KW ERP but has an antenna height of only 333 Meters. According to the F(50,50) chart, this station's 60 dBu protected contour should only be 75 Km yet it is protected out to 92 Km because it is a class C. This difference could prevent another station from being added to another market.

26) While we understand why the Commission has adopted the fixed mileage separation method to license LPFM stations, it is recommended that the proposals in Docket 98-117 be considered when adopting the fixed mileage requirements for LPFM stations.

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27) It is agreed that all LPFM stations should protect full power FM stations and other LPFM stations as proposed in the chart contained in the NPRM Appendix B for co-channel and first adjacent channels.

28) Please review the attached report prepared by Wireless Spectrum Resources, Inc. concerning the protection of the second and third adjacent channels.

LPFM Emissions and Bandwidth

29) The need for a very stringent program of equipment certification is a necessity for the LPFM service. To ensure that the station complies with the technical parameters of operation, all transmitters must be subject to the Commission's equipment certification program. Your Compliance and Information Bureau can provide details of many cases where interference to the air traffic control frequencies has been caused by improperly operated FM pirate stations. Additionally, many receivers used in private aircraft lack the selectivity to reject front-end overload from FM broadcast transmitters, thus you want to insure that stations operating in the FM service are not guilty of producing any emissions outside of the allotted bandwidth and thus can be blamed for causing interference to the aviation frequencies. Since LP100 and microradio stations will be operating with-out a modulation monitor, it is recommended that these

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transmitters be equipped with the necessary circuitry to limit modulation.

30) Because of the potential to cause interference to other stations, it is recommend that emission limits be tightened. The scheme proposed would require that emissions must be attenuated below the level of the unmodulated carrier frequency: (1) by at least 25 dB at any frequency removed from the center frequency by 100 KHz up to 200 KHz ; (2) by at least 35 dB at any frequency removed from the center frequency by 200 kHz up to and including 600 kHz; and (3) by at least $43 \text{ dB} + 10\log(\text{Power, in watts}) \text{ dB}$ on any frequency removed by more than 600 kHz from the center frequency. By adopting this tighter emission standard, it should help eliminate any interference to the second and third adjacent channels without affecting the fidelity of the station. With the new advances in filter design, the additional cost should not be prohibitive. Additionally if the digital IBOC systems are ever deployed, the tighter emission standards for the LPFM stations will help limit any interference to these systems.

31) Any decrease in the bandwidth would greatly impact the service as it would cause the fidelity of the station to suffer since receivers are designed for a 200 kHz channel. Narrow-banding the LPFM signal would cause the station to have inferior signal recovery in todays receivers. As recommended above, a tighter emission mask will accomplish the same thing without causing deterioration to the stations fidelity.

Ownership and Eligibility

Local and Cross Ownership:

32) Since the idea of the LPFM service is to make the broadcast spectrum available to as many as possible, your proposal to prohibit persons or entities with attributable interest in any broadcast station, is supported. Additionally the limiting of ownership to only one station per market or community again is supported, although this would still allow a network of these stations to be formed, and programed with out-of-market information. Therefore, it is suggested that a limit on the total number of stations owned by one person or entity be imposed. It is suggested that a limit of no more than 5 stations in one state and/or 20 stations nationwide be owned by one person or entity.

33) It is recommended that the LPFM radio markets be defined by counties within each state.

34) It is unclear what if any community benefit would be gained by your suggestion concerning the AM broadcaster who might apply for a LPFM station and then would have to divest their AM station if granted a LPFM license. The service area of a AM station is usually much larger area than the service area of a LPFM station, thus it is unclear what gain the AM broadcaster would get by such a switch. Then there would be the additional problem of a AM frequency which would either have to be sold or would go silent, thus disrupting the community of

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listeners to that station.

35) Because of the consolidation of the current broadcast station ownership, there are many non-owner individuals available in every market that have valuable experience in the broadcast industry and could be employed by or own a LPFM station. Owners of full power stations rarely have or know all there is to know about operating a broadcast station. A full power station usually has a staff which typically consist of a station manager, sales manager, bookkeeper, engineer and on-air staff. It is envisioned that a LPFM station would be staffed by the owner, who will serve as the station manager, sales manager, bookkeeper and if capable, engineer. While the Commission has allowed current broadcast station owners to own or control several stations in the same market, this would defeat the whole community concept of the LPFM service if these owners are not keep out of the LPFM service. This prohibition should also include other mass media outlets including cable system and newspaper owners. They already have a outlets with which to express their opinions and don=t need to intrude on the LPFM service.

36) A review of Section 202 of the Telecommunications Act of 1996, indicates that congress intended the changes in ownership to apply to existing full power stations since they refer to an existing rule, 73.3555. Since the LPFM service had not been proposed at the time of congress=s changes to the rules, it appears that the provisions of Section 202 would not apply to the LPFM

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service. The LPFM service as proposed, is a local community oriented service, to insure that the LPFM service stays this way, the Commission must limit the number of stations owned nationally. As stated above it is recommended that the Commission adopt the proposed limits on national ownership of LPFM stations. These proposed limits will allow some efficiencies of multiple ownership without harming the idea of local programming and access.

37) One efficiency that LPFM stations could take advantage of, is being represented by a non-owner third party which would be able to place advertising on several LPFM stations. This will allow the advertiser to place advertising on several stations at once, thus possibly cover the entire market. This would also assist the advertiser as they would only have to deal with one entity rather than each station.

National Ownership:

38) As stated above it is proposed that a national limit on ownership be 20 stations with no more than 5 in any one state. These limits would provide a efficiency of multiple stations without monopolizing any one state or market.

Residency Requirements:

39) Because the concept of the LPFM service is local community orientation, it is recommended that the Commission consider requiring licensee=s reside in the state in which the station is

Comments of Claudio Lisman continued

licensed. This can easily be confirmed by requiring a copy of the applicants driver license be submitted with the license application. For applicants with stations in more than one state, applicant must reside in one of the states for which he is applying for a station license. There is a requirement that licensee=s be US Citizens contained in the Communications Act of 1934 as amended. This is something that is imposed on the Commission by the Act and there appears no way to avoid this requirement.

Character Qualifications and Unauthorized Broadcasters:

40) The Commission=s proposal to apply the current standards for character qualifications to the LPFM service that are applied to the full power broadcasters is fully supported.

41) Concerning the parties that have operated unlicensed broadcast stations that the Commission has had to take action against, it is recommend that any operator who ceased operation upon receiving a warning from the Commission would be eligible to apply for a LPFM license. Those operators who within the past 5 years, that have had their equipment seized by the Commission would not be eligible to apply for a LPFM license during the first license period after adoption of this docket. This prohibition would also apply to being a part-owner in any LPFM station. If they have not committed any offense during the first license period, then they could apply to be a licensee of a LPFM station during the second licensing period. Any unauthorized operation during the first license period would prevent those individuals from obtaining or being a part-

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owner in any LPFM station for the subsequent license period.

Service Characteristics

Local Programming:

42) While it would be nice to be able to insure that a percentage of the programming on the LPFM stations was local, the effort to enforce this requirement would greatly impact the Commission's staff, thus with the ownership limits proposed and the requirement that each LPFM station maintain a local studio, it is recommended that the LPFM stations should be free to broadcast any programming that the licensee deems appropriate.

Commercial Programming:

43) As has been stated earlier, the programming on the commercial LPFM stations should be left up to the licensee.

Public Interest Programming Requirements:

44) Since the LPFM service will be a local community oriented service, the Commission's proposal to require LP1000 stations to comply with the public interest requirements contained in Part 73 of the Rules and Regulations is supported. Because of the type of service there is no need to apply these requirements to the LP100 and Microradio. This would not only overload

Comments of Claudio Lisman continued

the Commission staff who would have to review all the reports, but would also be a great burden on the licensee=s of these smaller stations.

45) It is distressing that the Commission has not proposed to require ALL LPFM stations to comply with the programming-related rules regarding the broadcasting of (1) taped or recorded material; (2) lottery information; (3) sponsorship identification; (4) personal attacks; and the most important, (5) periodic call sign announcements. It is recommend that the Commission rethink its position on these rules regarding the LP100 and microradio stations, and require all LPFM stations to comply with these important rules. These rules have been very important to the broadcast industry and it is believed that they should apply to all LPFM stations. There is little or no effort needed to comply with these rules on the part of the broadcaster.

Other Service Rules:

46) As commented earlier, the LP1000 station should comply with all the same rules and regulations concerning the main studio, public file and ownership reporting that are required of full power stations.

47) Being secondary services with the proposed non-renewal license periods, making the LP100 and microradio stations comply with the public file and ownership rules appear burdensome for Commission staff and these broadcasters.

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48) As has been maintained through out these comments, the LPFM service, being local community oriented, it is recommended that all LPFM stations comply with the main studio rule(47 CFR 73.1125(a)). This will insure that the station is accessible to the local community that it is serving and also help prevent large networks of these stations from being prograded by a satellite feeds from some far off city by a licensee who has no interest in the local community.

49) The environmental rules, other than the RF exposure rules, contained in the National Environmental Protection Act, should be applied to all the LPFM stations. Since few of these stations will be placed in areas which would trigger these rules, little burden will be placed on the LPFM licensees to comply with these rules.

50) The RF exposure rules must be applied to the LP1000 just based on the operating power of these stations. It is recommended that the LP100 stations be categorically excluded as has been done for the Part 90 stations. This will not eliminate the need for a environmental assessment at a multitransmitter site should the addition of the LP100 station cause that site to be in noncompliance. Microradio stations are operating a such a low power that they could be excluded from compliance with this rule.

51) Since the Commission is bound to statutory provisions of the Communications Act of 1934

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as amended, in paragraphs 312(a)(7) and 315, these provisions should apply to the LP1000 stations. Since these sections of the Act were adopted prior to the concept of the LPFM service, the Commission should exempt the LP100 and microradio stations from the requirements of these paragraphs. The Commission could use the fact that the LP100 and microradio stations are a secondary service, and thus are not covered by definition of A broadcasting stations.

Operating Hours

52) LP1000 stations should comply with the minimum operating schedule for full power stations. LP100 and microradio stations would operate as the licensee deemed appropriate.

Construction, License Terms, Sales and Renewals

(53) It is recommended that the construction periods for all LPFM stations be 12 months from the date the license is issued. LP1000 licensee=s would be granted one 6 month extension. This should allow adequate time for construction of these stations with out burdening the Commission with extension requests. Station modifications will not extend the construction time period. All construction must be completed with-in the 12 month period if not the license is canceled and will be assigned to another licensee that can construct the station. No sale or transfer of the license for a LP1000 station should take place until the station is constructed. This should help eliminate trafficking in this class of station. Other LPFM station licenses could be transferred but the construction period would not be extended by the transfer.

Comments of Claudio Lisman continued

Emergency Alert System

(54) All LP1000 stations being a primary service should be required to comply with the EAS requirements. The LP100 and Microradio stations would be exempt since their service areas are so small. While not required, LP100 and microradio stations could participate if they wanted.

Station Identification

(55) All LPFM stations should be required to broadcast some sort of station identification as required in section 73.1201. Station identification for LPFM stations could be unique since they are a special service. A simple system would be to use LP and the frequency that the station is operating on and city of license for the station ID. This would let the listening public know that they are tuned into a low-power station. The necessity to identify each station will greatly assist the Commission in enforcement of the regulations for this service.

Inspection by the Commission and Compliance with Its Rules.

(56) It is recommended that all LPFM stations be made available to Commission personnel for inspection during the hours of operation of the station. Additionally it is recommended that the Commission hold the licensee responsible, as are the full power licensee=s, for the proper operation of the station and compliance with all the Commission=s Rules and Regulations. Finally, the Commission=s adoption of Section 74.1203, 47 CFR 74.1203, which currently

Comments of Claudio Lisman continued

provides authority for the Commission to immediately shut down of a FM translator or Booster station, to apply to the LP100 and Microradio stations is supported.

Applications

57) This is the hardest area of any to recommend action. While wanting to be fair with all applicants, but being aware that the initial response will be great and possibly overload the Commission's resources. A first-come-first-served process is recommended, however there is concerned with the use of the internet to file applications. Not all e-mail service operates at the same speed and the path that the message must take to arrive at the Commission will be different for each person filing. This could put some applicants at a disadvantage to others. Therefore it is requested that the Commission reconsider its position concerning the applications for the LP1000 stations and use a paper application. Since these stations will be considered a primary station with the capability to cause interference to other stations, the applicant should be required to supply an engineering analysis to show that the proposed location of the LP1000 station transmitter will not cause any interference to the co-channel and adjacent channel stations. It would be hard to submit such an analysis via the internet or other electronic system. Since the LP100 and Microradio stations are both secondary service, it will be incumbent on these applicants to insure that the proposed station location will not cause any interference to the primary station operations in the area. Thus these stations could use electronic filing for the applications.

Comments of Claudio Lisman continued

Electronic Filing

58) See above comments concerning the electronic filing.

Filing Windows/Mutual Exclusivity

59) Because the LP1000 stations are a primary service and must be protected by the other smaller LPFM stations, it only makes sense to open a window for these applications first. A one month long window for applications nation wide is recommended. This should give all interested applicants ample time to file the application and accompanying engineering studies. Licenses would be issued on a first-come-first-serve basis for applicants with a properly completed application. The Commission may also consider a application fee for these stations. This might help eliminate the superfluous and speculative applications

Submitted by,

Claudio Lisman