

**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the Matter of  
Proposal for Creation of the Low Power FM  
(LPFM) Broadcast Service  
Docket No. MM 99-25

**To: Federal Communications Commission**

Comments of  
Kumar McMillan, representing  
the SAIC student group,  
Free Radio SAIC

I am writing on behalf of myself and the Free Radio SAIC group at the School of the Art Institute of Chicago. Our mission at Free Radio SAIC is to provide a forum for all students, faculty, staff, and community members to express and listen to a diversity of ideas, opinions, voices, and culture through the radio medium. This is a new group situated in a vibrant art school located in downtown Chicago. Furthermore, close to 80% of SAIC's student body--our main audience--all live outside of the downtown Chicago area and we are currently operating on a closed-circuit system restricted to one school building. By obtaining a LPFM license as proposed in Docket No. MM 99-25, Free Radio SAIC has the potential to establish itself as an important broadcasting entity within its school community as well as the Chicago community. We support the rule making document and would like to add the following comments:

**Most importantly, Free Radio SAIC will have to compete with skyscraper interference and pre-existing, major Chicago radio station frequencies in order to reach its student body audience. The comments below are on issues related to our situation:**

1. The FCC must use a "prohibited contour overlap" method of predicting interference, as is now easily done in the Low Power Television service with the appropriate computer programs. A one-time programming project will be all it would take to set up a program similar for LPFM interference prediction. Not only would this allow for many LPFM stations to flourish within the same area, but it would greatly help Free Radio SAIC to direct its transmission to key neighborhoods surrounding the city. The signal protection ratios remain the same as with the "mileage separation tables" but applicants can then have channels available where none were before under strict "mileage separation tables."

2. The 60 meter (197 feet) limitation on Class LP-1000 stations in the FCC NPRM should be increased to 100 meters (328 feet), which is the same as for Class-A full-power FM stations. This would provide for an additional 2-3/4 miles of coverage without requiring any additional power. Distance to 60 dBu contour would increase from 8.8 miles to 11.76 miles, which could help Free Radio SAIC reach the neighborhoods it needs.

3. LPFM must not be subjected to a narrower bandwidth than full-power FM stations since audio quality could suffer. However, we do support dropping sub-carriers other than stereo to prevent interference.

4. Class LP-1000 stations should include stations from 1,000 watts down to 200 watts, as long as an engineering showing proves no interference using the "prohibited contour overlap" method as mentioned above. These stations should be "primary status" and protected to their 1 mV/m (60 dBu) contour.

5. Class LP-100 stations should be designed to fit in where LP-1000 stations will not fit, even using directional antenna patterns kept in the FCC database. These stations should be "secondary status" with a minimum of FCC rules to adhere to, mainly technical rules to prevent interference.

6. Ten watt and below stations should not be authorized by the FCC since they do not cover sufficient area to be effective and the FCC lacks the resources to deal with the large number of such inefficient stations that would crop up. Radio spectrum is too scarce and valuable to be put to this limited use.

**Additionally, Free Radio SAIC would like to provide the following comments in order to promote the well-being of LPFM:**

7. LPFM must allow for "commercial" (commercially supported) as well as "non-commercial" stations. Although Free Radio SAIC is a non-profit school organization, this issue will be important to the rest of the LPFM community.

8. Some form of ownership restrictions must be in place to keep this service for "local owners" so as to not be snapped up by the large corporate broadcasters. The "50-mile rule", proposed in RM-9242, that requires an owner to live within 50-miles of his/her proposed antenna site would work nicely and would be easy to enforce by requiring applicants to list the coordinates (latitude & longitude) of their residence as well as their antenna site on the LPFM application along with a certification that they meet this requirement. If this rule cannot be established then some other method of assuring local ownership for LPFM must be worked out.

9. The FCC should try some form of "first-come first-served" application process with five-day filing windows. If this system proves unworkable, then and only then should the FCC consider using auctions to select between mutually exclusive (MX) applicants. If auctions are considered, there must be some form of substantial "bidding credits" available to small business applicants that would allow them to compete with applicants with large financial resources at their disposal. This is imperative since we are trying to lower the barrier to entry for new applicants of lesser financial status. The present scheme of bidding credits of 35% or 25% would not provide sufficient leverage for financially challenged individuals. I would suggest something more in the range of 50% to 75% for a more even playing field, if auctions are mandated.

Sincerely,  
Kumar McMillan

2307 W. North Ave. Apt. 3  
Chicago, IL 60647  
email: freeradiosaic@hotmail.com  
Free Radio Mission/ info can be read online:  
<http://www.bar-net.com/kumar/free.html>