

PUBLIC POLICY CONSULTANTS

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July 30, 1999

Chairman William Kennard and
Members of the Commission
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

Dear Chairman Kennard and Members of the Commission:

On behalf of Public Policy Consultants, we are pleased to submit for your consideration our comments on the proposal for creation of a Low Power Radio Service. This transmittal is in response to your issuance of a Notice of Proposed Rulemaking (NPRM) on January 28th.

We would like to applaud the Commission for proceeding with an NPRM, and hope that these comments will aid in your decision to proceed with a final authorization to go forward with this valuable new service.

These comments are based on our review of the NPRM, and identification of what in our view are some of the key issues before the Commission on this matter. Many of our views are the same as what we discussed in our earlier comment paper transmitted to you on November 30th, 1998. Accordingly, to complement our points in this current transmittal, we are attaching our earlier paper again as an Addendum, and request that it be incorporated by Reference for the Record as part of this current comment period.

The essence of our overall argument is that a Lower Power FM Radio service would be a significant boost to local communities in a number of important areas, particularly commerce, civic awareness and public education. We feel that Low Power Radio must be commercially based to be viable, but public service factors should also be a major consideration. We hope the Commission concurs with these views, and appreciates what an important step forward this service represents in terms of greater access to radio at the community level.

Additionally, we would like to stress our support that this service can be hopefully implemented without straining valuable Commission fiscal and staff resources. We appreciate that such concerns are very legitimate for public agencies at all levels of government.

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We would be happy to respond to any questions the Commission or staff may have during the subsequent Reply period. We hope these comments will be useful to you.

Thank you again for your consideration.

Respectively Submitted,

Brian Helvey

Edward Voccia

Executive Director

Technical Director

cc:

Commissioner Susan Ness
Commissioner Harold Furchtgott-Roth
Commissioner Michael Powell
Commissioner Gloria Tristani

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