

Before the  
Federal Communication Commission  
Washington, DC 20554

In the Matter of  
FCC DOCKET MM 99-25  
PROPOSAL TO LICENSE LOW POWER RADIO (LPFM)

TO: Federal Communication Commission

REPLY COMMENTS OF  
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First and foremost, I applaud the commission for taking action in ending the concentration of media in this country. The proposal to create Low Power FM Radio if passes will provide outlet for diverse and local voices that are underserved by current broadcasting market.

The following are my comments on the establishment of Low Power FM radio (NPRM 99-25):

I. LP1000, LP100, LP10

All proposed stations must be granted Primary Service Stations in order to have a viable radio service. Due to availability of spectrum, LP1000 should be limited to rural areas. LP100 and LP10 should be open to both rural and urban communities.

II. COMMERCIAL AND NON-COMMERCIAL

The choice between commercial and non-commercial stations should be that of the applicant. Commercially supported radios will benefit local businesses who were unable to advertise businesses to giant broadcasters. In my hometown of Vallejo, California (Population: 116,000) about a third of population are Filipinos but no local broadcast media outlets is available to hear information and music. LPFM could provide a means for businesses own by minority groups to concentrate their advertisement on specific population.

III. OWNERSHIP

I urge the commission to strict local ownership by adopting the A50-mile rule≡ with a

maximum of 2 stations per applicant. Further, ownership should be prohibited to existing full power radio stations, print media owners and cable and satellite broadcasters. The commission should also prohibit religious group and pirate broadcasters to own LPFM. Furthermore, local government applicants should be restricted to LP10 stations.

#### IV PREDICTING INTERFERENCE

For the LPFM to be successful, the commission should adopt a prohibited contour overlap in processing and predicting interferences. The current proposed system mileage separation tables will severely limit the number of LPFM stations that might be created, especially in major metropolitan market.

#### V. FREQUENCY AVAILABILITY AND RESTRICTIONS

Second and Third adjacent channel restrictions must be dropped for LPFM, not for incumbent broadcasters. Current improvements in receiver design will allow the restrictions to be dropped without causing interference to existing stations.

#### VII. STATION COVERAGE

LP1000 antenna height should be increased to 100 meters to provide a maximum coverage of 11.9 miles. This could help LPFM in rural areas to reach more people and enhance their competitiveness to giant broadcaster.

#### VIII. BANDWIDTH

To maintain quality audio, LPFM must not be subjected to a narrower bandwidth.

#### IX. LICENSE DISTRIBUTIONS

Three-day filing windows should be try on a first-come first-served basis. If this system is unworkable, FCC should consider auctions on non-monetary and underserved-minority weighted.

Again, I would like to thank the commission for allowing me to express my opinion on this long overdue matter. Our airwaves is being gobbled up by giant corporations who bombarded the airwaves with so called radio celebrities who's main objective is not to serve but to protect corporate America. Thank you for giving hope to local broadcasters to serve their community with diverse voices and services.

Sincerely,

Joselito Cruz

