

Docket No. MM 99-25

1. New FCC rules for LPFM must allow for "commercial" (commercially supported) as well as "non-commercial" stations.
2. Both the 2nd and 3rd adjacent channel restrictions must be dropped or realistically lowered for LPFM stations. Improvements in receiver design, since the rules were written decades ago, will allow these restrictions to be dropped without causing interference to existing stations or planned digital I.B.O.C. signals. The fact is that hundreds of full-power (grandfathered short-spaced) FCC authorized FM stations have been operating on 2nd and 3rd adjacent channels for several years with no interference complaints. If these stations do not cause interference, neither will 1000-watt LPFM stations.
3. It is hoped the FCC will use a "prohibited contour overlap" method of predicting interference, as is now easily done in the Low Power television service with an appropriate computer program. The LPTV service uses a computer program called "LP-ONE" to show if a proposed station would cause interference. It would be a one-time cost to have a similar program written for LPFM processing. This would allow for many more LPFM stations to be created nationwide and would make the use of standard "directional patterns" feasible. Allowing directional antennas, as is done in the LPTV service, again allows many more stations to be created by putting the signal where needed while limiting the signal in the direction of stations that need to be protected. The directional antenna patterns should be included in the FCC "directional antenna database" and using these patterns would become a simple matter. **This method is by far the most efficient use of the spectrum and with a simple computer program could be accomplished using minimum Commission resources. The benefits of making many more stations available easily outweigh any arguments against this approach, especially when computer processing is available at the FCC.**
4. 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. In this community, Woonsocket, RI for example, there are elevations from 400 feet to 50 feet above sea level with several close spaced hills all within the 8.8 square miles city limits. Allowing the additional antenna height, would help eliminate dead spots within the city, as well as provide for an additional 2-3/4 miles of coverage to very close-by neighboring communities without requiring any additional power. Distance to 60-dBu contour would increase from 8.8 miles to 11.76 miles, which could help LPFM stations reach significantly more people and thus enhance their ability to survive. While I can understand the reasoning for keeping LP-100 antenna heights under 200 feet so as to not require FAA clearance, there is no reason to limit "primary status" LP-1000 stations to such an arbitrary height, since they will have to abide by the majority of FCC rules that apply to full-power stations. LP-1000 stations must have a 100-meter limit, not 60 meters as proposed. This is very important! Antennas could be side mounted (which would create directional patterns) on existing structures at strategic locations, to provide coverage into difficult valleys that exist in many communities such as ours, and would not require FAA clearance.
5. LPFM must not be subjected to a narrower bandwidth than full-power FM stations since audio quality could suffer. I do support dropping sub-carriers, other than stereo however, to further help prevent interference.
6. Some form of ownership restrictions must be in place in order to keep this service for "local owners" so as to not be snapped up by the large corporate broadcasters which just occurred in our community. See WNRI purchase by Willow Farm Inc., owners of WOON AM, WNRI-AM (both Woonsocket, RI) and 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. It 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 during licensing and subsequently. The Full Service FM station assigned to Woonsocket WWKX-FM 106.3 MHz makes every effort to be known as a Providence station and has NO local programming, nor news, and was recently cited for allegedly broadcasting indecent material (See FCC DA 99-511). If this rule cannot be established, then some other method of assuring local ownership for LPFM must be worked out, to help prevent the big from getting bigger!
7. 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 this effort by the Commission to lower the barrier to entry for new applicants of lesser financial status seems fair. 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.

8. AM/FM/TV station owners in or within 64 miles of the applicant community should be prohibited from applying for LPFM licenses, since the obvious purpose of Docket No. MM 99-25 is to open the door to competition and program variety.

9. Class LP-1000 stations should include stations from 1,000 watts down to 200 watts, as long as 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.

10. Class LP-100 stations should be designed to fit in where LP-1000 stations (or a lesser power level) will not fit, even when using accepted 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.

11. Ten watt and below stations should not be authorized by the FCC. They would not cover a 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 and occupy the scarce number of channels currently available. Many of those folks promoting the creation of 1-watt to 10-watt stations are pirates with no practical knowledge of the radio business and what it takes to survive economically. They seem only interested in having their "hobby station" to suit their whims. The Radio spectrum is too scarce and valuable to be put to this limited use. With current rules and regulations, it is impossible to squeeze in just one more commercial station in this area, due to current FCC limitations, so I welcome and applaud the Commission's effort in trying to resolve this situation.

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