

Before the
Federal Communications Commission
Washington, D. C. 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 **Larry W. Pierce**

Before you is the matter of the creation of Low Power FM Broadcast service. More years than I care to remember I worked in the Broadcast industry for several years. During that time I developed a desire to own a radio station. Investigation into the matter revealed to me that I did not qualify due to rules pertaining to a person had to be able to financially apply for and build a station and operate it for one year with no income. In 1966 this was reserved for the wealthy or large company's who owned multi-stations in different markets. I even went so far as to contact the small business for a loan to get one started and was advised I did not qualify because I wanted to start a radio station with government funds and "I might get on the air and say something bad about the president". So I pursued other careers. Costs of acquiring a Broadcast station today are more prohibitive than when I originally want to build one.

While always having an interest in Broadcasting I tried to keep abreast of happening in the industry which became a lot easier thanks to the Internet. This is when I found the information regarding LPFM. I have read the complete proposal for its creation and I agree with those matters located in **RM-9242**. **LPFM** must allow for both Commercial and Non-Commercial. With the new technology in receiver design I do feel 2nd and 3rd Adjacent channel restrictions must be dropped for LPFM. Hundreds of Grandfathered stations are operating today with out interference to each other.

For stations to maintain a good coverage area and be economically able to be self-supporting the greatest range permissible with the Class LP-1000 should be increased to 100 meters antenna height with the same power. Class LP-1000 stations should include station ranging from 1,000 watts down to 200 watts, as long it causes no interference and should have "primary status". This would better serve the public and smaller towns where I live who are limited to a local station which is automated (FM) and a daytime AM that barley covers small towns 15 miles away in the same county and is unable to provide. The services that a locally operated stations could provide with news, local events, sports, etc.

Owners of the stations locally do not have any connection to this community or county since the owners have not lived in this market area since they acquired it approx. 10 years ago. Limiting the area of ownership is a must for this service to properly serve the public interest the fifty-mile rule is a must. Owners of our two local stations currently have purchased a station (AM) 15 miles away to the west and 20 miles to the north (FM). Stations can have owners who visit the area or commute back and forth and join all the local civic organizations do not seem to me to have the local interest at heart just the revenue seems to be the factor.

In closing please give the creation of the LPFM service great thought and consider those who care about their communities and how valuable the LPFM service could be for all Americans. Those opposing like the NAB should have better reasons other than the deep-rooted that the Broadcast industry should not be a monopoly for the rich.

Respectfully submitted

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