

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of
LPFM Notice of Proposed Rulemaking
(LPFM) Broadcast Service

FCC MM Docket 99-25

Comments of James J. Henderson
August 1, 1999

There are three areas of concern that I wish to address: commercial vs. non-commercial; wattage (with regard to LPTV) and ownership requirements.

One: It costs money to run any size of station in a professional way. Community based LPFM should be allowed the *choice* of being commercial or non-commercial. Let the needs of the community determine which is best. One size here does not fit all. Allow for diversity in this area! There is no way a small community station is going to cause economic trouble for the stations owned by large group owners. Merchants in a small community could not afford \$100 for a single commercial on those stations. Hence, they would have no radio advertising available to them without LPFM.

Two: There is a *big gap* between a station of 100 watts and a 1000 watts. I know there are situations where a 1000 watt station would not “fit”, but 900 watts would! Common reason tells us that a station of 100 watts might *not be enough power to cover a community of 10 rural miles* but a station of 500 watts would. Again, how can we best serve the needs of these small under served areas?

Consider: LPTV uses “prohibited contour overlap” and directional antennas this could help solve the problem of having more non-interference wattage. I also urge the commission to increase to LPFM antennas to 100 meters. This will also help increase coverage areas.

Three: Community LPFM must be owned by those *in the community!* No one in New York should be allowed to own an LPFM in rural Idaho. We need to insure a *reasonable* allowable distance for any LPFM owner. I would say *no more* than 50 miles from city of license — perhaps less! Credits should be given to applicant for length of time they have lived in the community of proposed license. And this service should not be allowed for those holding traditional am/fm/tv licenses! And no more than one LPFM station to a license holder! No more big groups!

In conclusion: there is a need for community based LPFM. The government has made an issue of working to cut burdensome paperwork that hurts business large and small. *Please!* Don't stifle these *small business* with the same masses of paperwork that the larger city stations have.

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