

Before the
Federal Communications Commission
Washington DC 20554

In the Matter of
Proposal for the Creation of the Low Power FM
(LPFM) Broadcast Service

Docket No. MM 99-25

Comments of Jeffrey A. Libby
1401 N.E. Ball Drive
Lee's Summit, MO 64086

I am in support for the creation of this service. There are several issues that are addressed that will make LPFM a fair and viable new entry class of broadcasting.

1. Commercial vs. Non-Commercial

LPFM, both 1000 and 100 must be left up to the applicant as to whether the station is commercial or non-commercial. If LPFM is all non-commercial, it will close the door on many individuals who wish to serve the community they live in. Only educational and religious entities will be able to afford to buy the equipment and keep it on the air, especially for the LP-1000 Class. This will alienate the public who supported the LPFM proposal and leave them with LP-100 or lower, and they will have to support their station out of their own pocket.

2. Second and third adjacent frequency separation

If the frequency separation is not dropped for LPFM, then it will force LPFM out to the rural areas and combined with the potential of non-commercial status, could end up not having enough support or listeners to justify keeping a station on the air. Many, if not all of the metro cities of the United States will have only full power stations, thus excluding suburbs of metro areas that could support LPFM both in business and listeners.

3. Ownership

Ownership must be local. A LPFM party based in St. Joseph, Michigan will not know the programming needs for a station they can own in St. Joseph, Missouri, and vice versa. Limiting the amount of LPFM stations that can be owned within a certain radius of their residence, will keep LPFM from falling into the hands of big business.

4. Antenna Height

The proposed 60-meter antenna height for LP-1000 stations may not be enough to effectively cover their city of license, especially for listeners in mobile vehicles. A maximum antenna height of 100 meters should be sufficient. This will not be a problem since most LP-1000 stations will have to lease space on towers that are already FAA compliant.

5. EAS

I believe the Emergency Alert System is vital to any community. LPFM-100 stations must relay any emergency messages for their service area, if only to a dozen unsuspecting listeners. LPFM would suffer a black eye if these dozen listeners were hurt or killed by a tornado. It's hard enough to get some full power FM stations to make tornado warning announcements. Radio must inform listeners of any local, state or national crisis, or make an announcement and leave the air.

6. Current AM station owners

I am against current AM station owners of a daytime power of no greater than 2500 watts or a nighttime power of 500 watts or less to apply for a LPFM Construction Permit right away. I understand their concerns, but only after potentially qualified newcomers have had a chance to apply first. I feel a newcomer should have priority over a current AM station owner for the same frequency in the same area. I also feel once an AM station owner is granted a LPFM C.P., they must sell their AM soon afterwards.

7. Bandwidth

Reducing bandwidth for LPFM could hurt the stereo audio quality, especially in the fringe areas. Please keep the bandwidth as it is for full power FM's. Eliminating SCA for LPFM might help to reduce any interference.

The issue of LPFM is very controversial. I applaud the Commissioners' for your foresight into this matter. As big business continues to get bigger, (Sinclair Broadcasting selling radio stations to Entercom), MM 99-25 with the above recommended changes, will give the chance for new small businesses and non-commercial applicants to apply and legally serve their communities with programming the applicant feels is in the public's best interest. For Low Power FM to succeed, it must be flexible and fair, not catering to a select group.

Sincerely,

Jeffrey A. Libby

