Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In the Matter of	)	
	)	
Creation of a Low Power Radio Service	)	MM Docket No. 99-25
	)	RM-9208
	)	RM-9242

To: Chief, Mass Media Bureau

COMMENTS

Introduction

The National Translator Association (NTA), by its attorney, hereby submits its comments in the above-captioned proceeding. NTA is a nonprofit volunteer organization dedicated to the preservation of free over-the-air television for all areas of the United States. Membership is made up of organizations and individuals licensed to operate FM and TV translator stations, persons who install and maintain translators, and full service broadcasters who benefit from the extended service provided by translators

The NTA does not take a position on whether or not the Commission should institute rules for low power FM radio (LPFM) stations. If there is to be such a service, however, it should be structured somewhat differently than proposed in the NPRM.

Interference Criteria

If it is determined that it is in the public interest to have LPFM radio, then the service should be structured in accordance with the best engineering principles. The Commission=s proposed mileage separations plan will limit the number and restrict the location of LPFM facilities far more than necessary. NTA strongly urges that protected and interference contours be the basis for authorizing stations.

FM translators are authorized using such criteria, and searching for channels is not unduly burdensome. As far as the application processing effort at the Commission is concerned, dealing with interference ratios is no more time consuming than dealing with mileage separations. An analysis program similar to the low power TV ALPONE≅ program will be required. But presumably low power FM applications will be filed electronically, and the computer program will pick up the data from applications and provide go no-go answers for each application with virtually no staff effort. Thus, any new LPFM service should logically build on the experience gained from FM translators and should evolve from them, just as LPTV evolved from TV translators.

FM Translator Status

New LPFM stations should have equal status with FM translators in the use of the spectrum. It would neither serve the public interest nor be fair to existing FM translator licensees to have low power FM stations displace FM translators. FM translators have done yeoman service in extending existing full-service FM signals to underserved areas, and there can be no useful purpose served by denying audiences radio service they now enjoy.

Third and Second Adjacent Channels

NTA notes with interest the NPRM=s contemplated relaxation of third adjacent channel protection, and possibly even second adjacent channel protection, in the LPFM context. Such a decision should be made on the basis of engineering knowledge of the characteristics of FM receivers in common use. NTA does not have such knowledge and hence cannot make an informed recommendation, but if there is rationally defensible engineering evidence that lesser protection than currently specified is adequate, then FM translators should be authorized on the same basis.

Equipment Approval

The NTA believes that properly designed transmitting equipment will be essential in minimizing interference from spurious products. The Commission=s proposal in & 51 to require FCC certification of LPFM transmitters is a good one, and the NTA endorses it.

One further recommendation involving equipment certification is that an optional modulation level indicator be built into the transmitter, with the circuitry covered by the certification, or in the absence of such a feature a separate modulation monitor be a requirement.

Protection of Inputs to FM Translators

NTA members who operate translators report frequently having experienced problems with interference to the input signals for their translators from new translators installed in the same area by unrelated parties. LPFM stations will likely create more of the same problems. An applicant for an LPFM station should therefore be required to protect the input signals of nearby FM translators. Such applicants should also be required either to select an output channel that will not affect the inputs of nearby FM translators, or to reach an agreement with the FM translator licensee regarding

an engineering solution to the input interference.

In this connection, the NTA urges the Commission to add the actual input signal frequency and source (call sign) to the FCC=s FM engineering database.

Local Programming

The primary justification for the creation of an LPFM service is to provide more Alocal voices≅, directed in many cases to unserved niche audiences. The NTA understands that many small market stations are fed almost entirely by a programming service distributed by satellite to many stations from a distant city. Although a station employee is on-duty locally, breaks are prerecorded by the program service to sound locally generated and then are remotely triggered.

Such stations hardly constitute a Alocal voice≅. LPFM stations should be required to be truly programmed locally and not allowed to be a pass-through station disguised as a local operation.

Summary

The NTA urges the Commission to use the protected contours of existing stations and interference ratios from new stations as the basis for authorizing LPFM stations; to afford LPFM stations and FM translators equal priority in the use of available frequencies; and to protect FM translator input signals from the incursion of new LPFM signals.

Respectfully submitted,

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