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Division of Media Resources

102 Perkins Building
521 Lancaster Avenue
Richmond, KY 40475-3102
(606) 622-2474
Fax: (606) 622-6276

FEDERAL COMMUNICATIONS COMMISSION
AUG 02 1999
FCC MAIL ROOM

July 30, 1999

Magale Roman Salas
Secretary, Federal Communications Commission
445 Twelfth Street S.W.
Washington, DC 20554

RE: Low power FM comment on proposed rule making: MM 99-25.

Dear Ms. Salas,

The FCC has proposed (in Docket #99-25) a low-power FM service in the existing FM Band, 88 to 108 Mhz. I propose extending the FM Band to become 86 to 108 Mhz. By moving TV channel 5 and TV channel 6 lower by 2 Mhz with the onset of DTV. LPFM's would operate in the expanded portion of the FM band.

As DTV's go on the air and occupy VHF channel 5 and channel 6, the new channel frequencies would become 74 to 80 Mhz for channel 5, and 80 to 86 Mhz for channel 6.

New DTV receivers would have to be designed for these new channel frequencies.

Services currently using 74 to 76 Mhz would have to be allocated to other frequencies only if a channel 5 interference problem exists. One possible solution would be to move those services with interference problems to the top end of the 6 meter amateur band or 52 to 54 Mhz, where there is little use currently. This could be handled on a state level by a frequency coordinator.

As the existing TV Broadcasters convert to DTV "windowing" of LPFM stations could occur which would allow receiver manufacturers time to meet new channel design requirements. Some areas where channel 6 does not exist could be implemented quickly. Because most LPFM assignments are low power, the channel 6 interference problem could be negligible and existing non commercial FM Broadcasters could get some relief from existing interference standards.

Thank you for consideration of my comments.

Yours truly,

David H. Greenlee
Assistant Director/Engineering
Division of Media Resources
Eastern Kentucky University

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