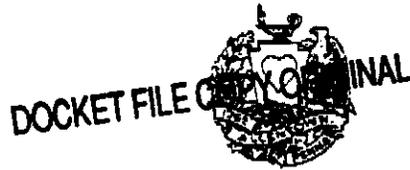


CITY HALL
435 Hamilton Street
Allentown, Pennsylvania
18101-1699



WILLIAM L. HEYDT
Mayor
(610) 437-7548
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City of Allentown

July 30, 1999

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: **COMMENTS - In the Matter of
Creation of a Low Power Radio Service
(MM Docket No. 99-25; RM-9208 and RM-9242)**

Dear Ms. Salas:

On behalf of the City of Allentown, Pennsylvania ("Allentown"), I am submitting these comments in support of the proposed creation of a secondary microradio service as proposed in the above-referenced rule making proceeding.

Allentown supports the creation of a low power FM service to operate with a maximum antenna height of 30 meters HAAT and an effective radiated power of 1 to 10 watts, as proposed by the Commission. The creation of such a service will serve the public interest by allowing potential licenses, such as Allentown, to provide community-oriented, local, radio broadcasting.

In fact, Allentown successfully provided such a low power FM service to visitors of Allentown's 1998 annual winter light festival.* During the 1998 Holiday season, Allentown hosted its annual winter light festival, which is a vehicle tour of our Holiday Light Display (extending for about 1.7 miles). Because Allentown was able to obtain an Experimental FM Broadcast Station License (to evaluate the suitability of low power FM broadcasting in an open-air, urban setting for "event" and "venue" broadcasting), the 1998 winter light festival was accompanied for the first time by music and information. The success of Allentown's Experimental Station clearly demonstrates that microradio stations may in fact be operated without causing interference to existing full power FM stations.

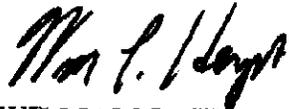
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*Allentown was able to provide this low power FM broadcast service under an Experimental FM Broadcast Station License granted by the Commission on November 16, 1998 (FCC File No. BPEX-981015ME). See Report on Experimental FM Station WX2XMA, submitted to the Commission on April 7, 1999.

The Commission's adoption of the proposed microradio service will permit Allentown to seek a permanent microradio license so that it may continue providing aural entertainment and information at its annual Holiday Light Display. It will also allow communities such as Allentown to use microradio stations to disseminate general information about community events and local safety concerns (e.g., road projects, detours), for example. Accordingly, The City of Allentown fully supports the adoption of a microradio FM service, as proposed in the above-referenced rule making proceeding.

Sincerely,



WILLIAM L. HEYDT
Mayor

xc: Joe D'Annibale, Superintendent, Communications
Jeff Kelly, Service Electric Cable TV, Inc.