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July 29, 1999

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FCC MAIL ROOM

Office of the Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

RE: Docket No. 99-25 (Low Power FM)

Dear Federal Communications Commission:

You have asked for comments with respect to the proposal to license a new class of Low Power FM (LPFM) services. As public broadcasters, WMUB and its licensee Miami University support the concept of diversity in available program choices for all Americans; indeed, we believe that this service is one of the bedrock foundations of our existence as public broadcasters. As currently envisioned, however, Docket 99-25 is flawed. If adopted, it will result in less meaningful service to the American public and will work an unwarranted hardship on the existing public radio system in particular.

WMUB believes it is not in the public's interest to move forward with this proposal, unless and until the FCC hears all relevant objections and fully studies the many technical concerns which exist. We believe it to be very unwise federal policy to enact LPFM until these concerns are resolved, because there are unintended consequences with the LPFM plan. Among these concerns and consequences are the following:

- It is far from clear that the interference that would be permitted on second and third adjacent channels will in fact be harmless to the licensed signal of existing stations.
- resultant LPFM spectrum pollution has the potential to harm conventional subcarriers, thus endangering Radio Reading Services for the Blind, as well as paging and data services from which many stations earn income.

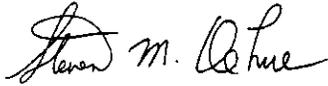
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- LPFM may endanger FM translators, which are a significant component of public stations' service, especially in the Western states. Of special concern is the ability of translators to receive over-the-air signals from their originating station. The FCC's tests did not take into consideration the effect of terrain such as mountains on FM signals to and from translators.
- The proposal is risking the digital future of radio. It is unclear if LPFM and digital FM transmission systems using IBOC (In-Band On-Channel) are compatible. Technical standards for digital radio have not been established and hence disruption of IBOC services cannot be ruled out without much more testing. It would be a terrible legacy if the FCC takes steps now that would inhibit radio's ability to convert to digital in the near future.
- Docket 99-25 proposes allowing illegal "pirate" broadcasters to apply for LPFM licenses as long as they have voluntarily ceased operating an unlicensed station. The proposal is a reward to pirate broadcasters who have been violating the current law. Regardless of whether an LPFM service is established, the problem of pirate broadcasters will still persist and likely get worse.
- Enforcing LPFM compliance will require additional FCC resources. The issues of piracy, a whole new class of licensees and resulting interference concerns threatens to overwhelm the FCC's already-strained ability to conduct the proper engineering reviews of applications and enforcement of existing policies.

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Opposition to the LPFM issue among public broadcasters is not a matter of blocking additional voices on the air. Public radio, after all, represents diverse viewpoints and programming that is alternative to commercial radio. But the public will be ill-served if current public radio signals are eroded, and the FCC creates a class of stations that are too under-powered to fund themselves.

Sincerely,



Steven M. DeLue
Associate Dean
College of Arts and Science
Miami University



Cleve Callison
General Manager
WMUB Public Radio
Miami University

cc: FCC staff
Commissioners