

In the Matter of:

MM Docket Nr. 99-25

Creation of A Low Power  
Radio Service.

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I wish to formally comment in support of the proposal. I also wish to offer technical suggestions with regard to transmitter emissions and modulation control.

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FORMAL COMMENTS OF:

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Submitted on July 28, 1999 to the Office of the Secretary, FCC.

I (as an individual, and resident of Glacier, WA, residing at 9624 Mt. Baker Highway) file these comments concerning MM Docket Nr. 99-25. I request that my comments be circulated, if possible, to the commissioners. Nine copies are included for this purpose.

Glacier is a small Northwest Washington rural community in the foothills of Mt. Baker, and approximately 40 miles from the nearest radio or television stations in Bellingham. Reception of commercial stations is poor or non-existent, yet Glacier has several hundred permanent residents concerned with a number of community issues -- and no proper way to communicate them on a local level.

Bulletins and flyers at the local country store are sometimes effective, but a small (10 Watt to 100 Watt) low-power community FM radio station would be a truly useful addition in order to provide local weather information, school bus schedule changes, coordination in emergencies, and other uniquely "local" services and entertainment. The internet is not a viable solution for many residents due to cost, and the fact that local telephone service is unpredictable, and slow at best.

However, as an Electrical Engineer with considerable experience in commercial broadcasting (and holder of both a General Radiotelephone License and the Advanced Amateur License), I have some concerns (and suggestions) with regard to certain technical points raised in the referenced Docket.

1. I believe that privately built FM transmitters should be allowed if LPFM service is approved. However, as an engineer I know how difficult it is to prevent out-of-channel (and out-of-band) emissions -- particularly in a situation where access to a spectrum analyzer may be cost prohibitive.

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I strongly recommend that transmitter certification by an accredited laboratory be required. Alternatively, for very small communities with limited budgets, it may be worthwhile considering allowing certification of a single transmitter by a member of that local community who is willing to take personal responsibility for proper certification on the basis of his/her Extra/Advanced class Amateur license (or General Radiotelephone license). Holders of these license classes, while not necessarily being personal "experts" on emissions requirements, certainly offer a high probability of having the technical training and personal qualities required to become knowledgeable and to carry out a proper certification. This approach would also be advantageous from the point of view that the person doing the original "certification" would also be a member of the community being served, and would therefore have some level of vested interest in maintaining ongoing compliance of the station.

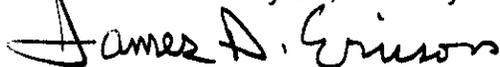
2. On the matter of requiring "reduced bandwidth" for LPFM service: I do not believe this to be either necessary or workable. LPFM service by its very nature will tend to broadcast fairly weak signals (compared to higher powered commercial stations). To limit bandwidth (deviation) would only further tempt operators to apply inappropriate audio processing which might result in other problems. A more effective control would be to require some capability for monitoring modulation and deviation (whether through circuit design, or a simple monitor).

I believe that approval of low power FM service for rural locations will be of great benefit in providing much needed services that do not (and cannot) exist in the commercial realm.

These local services also will provide an excellent training opportunity for people young and old alike to develop technical expertise and communications skills, the results of which will doubtless prove to be of immediate and tangible value to themselves and their community.

Thank you sincerely for your consideration of my comments.

Submitted on July 28, 1999 by:



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General Radiotelephone Certificate PG-12-14287 issued SF, CA 1/2/85

First Class Radiotelephone Certificate P1-12-30759 issued SF, CA 8/1/79

(initial First Class License obtained in 1959).

Advanced Amateur KG6EK issued 2/1/96, expires 2/22/04

(initial Advanced License obtained in 1984).