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July 26, 1999

Office of the Secretary
 Federal Communications Commission
 445 12th Street S.W.
 Washington DC. 20554

MM Docket 99-25
 Creation of Low Power Radio Service

This letter is in opposition of the creation of LPFM. While the principle of the proposal is noble, KPLU is concerned that the FCC's effort to develop rules permitting the establishment of LPFM service will create interference to reception of existing full service public radio stations. It seems that the potential for interference is especially high because of the contour protection methodology used to establish protection criteria in the non-commercial portion of the FM band where most public radio stations operate.

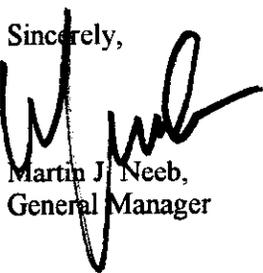
Like many public broadcast stations, KPLU also operates a number of translators bringing quality public radio to outlying communities. Originally established with federal grant monies, the locally focused service these translators have in these communities have received strong listener support, both financially and for the unique programming we bring. Our concern is that the creation of LPFM service could cause great harm if it can bump existing NCE translators in favor of creating LPFM services of unknown origin and content.

KPLU relies on the financial support of its listeners for its award winning quality programming. More than 60% of our annual budget comes from the communities we serve. A portion of our budget also comes from use of subcarriers. With the LPFM proposal comes possible compromise of spectrum for our main carrier, which in KPLU's case could mean loss of more than \$65,000 annually to our operating budget, not to mention the loss of service that these subcarriers provide to the community. LPFM with its second adjacent channel spacing restrictions will also likely harm radio broadcasters in their transition to digital as the proponents of IBOC digital radio are developing systems based on current interference protection standards.

Additionally, it seems that enforcing LPFM compliance will require additional FCC resources. Interfering LPFM operations (even unintentional ones), ensuring adherence to non commercial rules and policies permissible fundraising and health and safety hazards such as radio frequency radiation and Emergency Alert System compliance, will add significant burden to the FCC enforcement efforts.

In conclusion, KPLU joins our broadcast colleagues in stating that the intentions of the LPFM initiative will not be met, but instead jeopardize treasured existing service.

Sincerely,



Martin J. Neeb,
 General Manager

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Federal Communications Commission
Attn.: NPRM # FCC 99-6
445 12 Street, S. W. Washington, DC 20554
Phone: 202.418.0260

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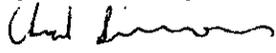
RE: NPRM # FCC 99-6, MM Docket # 99-25 & 95-25

I urge you to adopt rules for licensing Low Power FM radio that prioritizes the needs of under-served and under-financed communities. Your office has the power and the mandate to ensure that ordinary people can claim a piece of the pie that big corporations have dominated and controlled for years. I am confident you agree that broad citizen access to information and culture is at the heart of a democratic society.

To support this vision, I urge you to legalize microradio with the following concerns in mind:

1. This should be a completely non-commercial service. The current radio spectrum is dominated by commercial media. LPFM licenses should go to non-commercial community groups who want to use radio to communicate to the constituents and their neighbors, not to make a profit. It should always be free of the muting influence that pleasing advertisers carries with it.
2. Microradio licenses should be held locally, be non-transferable, affordable to all communities, and easy to apply for and limited to one per license holder; they should NOT be businesses.
3. Power levels should go up to 100 watts in urban areas and up to 250 watts in rural areas,
4. No secondary status should be allowed, that is, microstations should not be subject to losing the frequencies just because someone wants to set up a more powerful station in the neighborhood.
5. Microbroadcast pioneers, who created this moment by courageously committing civil disobedience, in the tradition of Ghandi and Martin Luther King, and for their pains have suffered government seizure and fines should receive amnesty, have their property returned, and be prioritized for new licenses.
6. Problems, technical or other wise, should be referred to local voluntary micropower organization for assistance or mediation (as is done in the ham radio world).
7. LPFM must be included in the future of digital radio.

Thank you for your time and your consideration of these vital issues.

Sincerely, 
Chad P. Simmons
4376 Caliente Street
Las Vegas, Nevada 89119
(702) 734-6806

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