

Proposed Rule
To Create A
LOW POWER RADIO Service
Docket MM 99-25

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DUE AUGUST 2, 1999

July 28, 1999

RECEIVED

Secretary
Federal Communications Commission
The Portals
445 Twelfth Street S.W.
Washington, DC 20554

AUG 02 1999

FCC MAIL ROOM

RE: FCC DOCKET MM 99-25 (Low Power Radio)

Dear Commissioners and Commission Staff:

I am a strong supporter of Low Power Radio. Enclosed are 15 copies, plus an original, of my Written Comments on the Proposed Rule in Docket MM 99-25 (aka Dockets RM-9208 & RM-9242).

I commend the Commission for taking action to end the current ban on Low Power Radio. I urge the Commission to carry this process forward until a viable, and meaningful, Low Power Radio Service has been firmly established.

Specific recommendations for making a good proposal better can be found in the enclosed Written Comments.

Sincerely,

Gloria Ellen Mow

Gloria Ellen Mow
36719 Jackson Avenue
Dade City, Florida 33525
email: Learnfun@aol.com

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**Before The
FEDERAL COMMUNICATIONS COMMISSION
The Portals
445 Twelfth Street S.W.
Washington, DC 20554**

**In Matter of:
Creation of a Low Power FM Radio Service**

**MM 99-25
RM 9208
RM 9242**

**Comments
By**

**Gloria Ellen Mouw
36719 Jackson Avenue
Dade City, Florida 33525**

July 28, 1999

Dear Chairman Kennard, and fellow Commissioners;

I am writing you on behalf of Low Power FM. The decision of the Commission to expand the existing FM broadcast service to include licensing of FM transmitters operating less than 1000 watts is well received in my hometown. In fact, there is excitement here that LPFM will soon be a reality. I am generally in agreement with the Commission's proposal, and in areas where we differ, I will comment.

I live in Dade City, Florida, a community of less than 6,000 residents. Dade City is located approximately 35 miles north of Tampa and 50 miles southwest of Orlando in West Central Florida. Dade City has a developing tourist trade as a result of antique and collectibles, and is host to a two year community college, and Saint Leo University, in the nearby Town of Saint Leo. The population base is a mixture Euro-Americans, African-Americans, and Hispanics.

Though at first face, it would appear that Dade City enjoys the benefits of being included in a top 20 radio market, but nothing is farther from the truth. Dade City is currently serviced on AM at 1350 kHz by a station that relies on satellite feed for the

bulk of it's 24 hour/7 day a week broadcast schedule. Community service is limited to airing local school sporting events.

The FM side is no better. 96.1 operates as a Spanish speaking station who's commercial interests target Tampa. Continuous monitoring of this station reveals nothing more than a Spanish version of the other playlist stations operating in the Tampa Bay area.

My Proposal

Is the creation of a real community radio service as the Commission and others have envisioned. In this community we will draw on the local culture and flavor, and build on it. As the county seat of Pasco County FL, the public will have access to County Commission meetings and other matters for those us who reside in Pasco County.

Dade City council meetings will no longer be limited to those who are fortunate enough to be able to attend. In addition to sports, the local public will have access to information from the Pasco School District in a manner that before now was unavailable. As an educator, I find special appeal by connecting the classroom to the public.

In addition to the Commission's comments, I also propose the following:

1. LPFM licenses should be awarded for non-commercial use throughout the spectrum from 87.9 to 107.9 MHz. Licenses should be issued on a first come, first served basis, much in the same way as the Vanity Callsign system in the Amateur Radio Service.
2. Licenses should be held locally, be non-transferable, and affordable. License applicants must not be businesses. Ownership must be confined to community groups, religious, educational, and those segments of American society that for one reason or another, have been excluded from the "American Experience".
3. All three power classes under consideration by the Commission should be adopted.
4. The Micro-Class 10 watts or less should be allowed operation on 87.9 MHz.
5. Eliminate the horizontal polarization requirement for LPFM stations. The reality is that most FM listeners are in autos and/or using portable devices operating in the vertical plane. The requirement for max E.R.P. to exist at a minimum, in the horizontal plane is no longer a necessity and would not serve the best interests of the LPFM audience.
6. Maximum antenna HAAT should be 100 meters for all classes.
7. Power classes greater than 100 watts should use type accepted equipment.
8. Stations should be locally programmed. However, recorded materials such as music, poetry, documentaries, features etc. may be used. Sharing of program materials and resources among micro and community stations is strongly encouraged. No more than 20% of airtime from off-site feeds should be permitted.
9. Amnesty should be granted to all persons found to be in conflict with the interpretation of FCC Rules regarding operation of LPFM stations. The following conditions should be taken into consideration: 1, there was no attempt to commit a crime while operating an unlicensed LPFM station, 2, the unlicensed LPFM station did not cause

harmful interference to other licensed services, and 3, those LPFM stations were genuinely operated in the public interests of those served, with affirmation to that fact provided to the Commission if necessary.

Conclusion

Again, I commend Chairman Kennard and the fellow Commissioners for your willingness to address these issues. We are hopeful that the creation of a new class of low power FM radio licensing becomes a reality during the Chairman's present term. Also, I appreciate the comments of the dissenting Commissioner. Our constitutional form of government is founded on critical reasoning, without it we cannot survive as a nation.

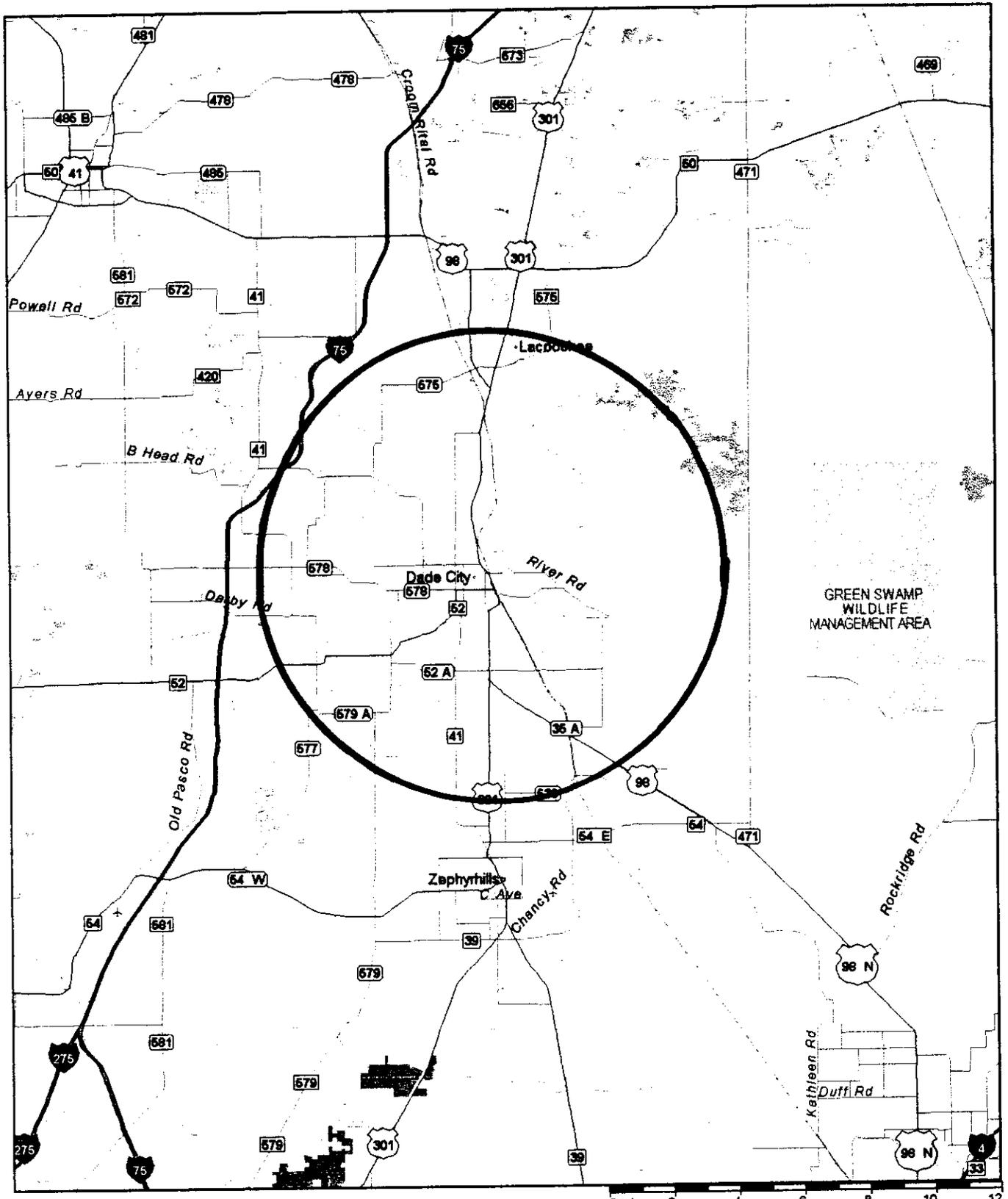
Therefore I respectfully request, that:

For the reasons set forth herein, I URGE THE COMMISSION to: a) proceed with issuance of a Final Rule, in Docket MM 99-25, that will establish a Low Power Radio Service; AND (b) adopt all of the policy recommendations which are contained herein, in order to assure that the Low Power Radio Service will be both viable AND meaningful.

I look forward to working with the FCC in an effort to make the airwaves more accessible for the citizens in our local communities.

Gloria Ellen Mouw
Sincerely;

Gloria Ellen Mouw
Specific Learning Disabilities Teacher



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Streets Plus

Dade City, Florida
 Expected LPFM Service Area