

MM Docket 99-25
7/26/99

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In the matter of Low Power FM, the writer, Dean Spencer, a registered Professional Electrical Engineer, and majority owner of Class A FM stations in Bedford, and Mitchell, Indiana, hereby petitions the commission to close this proceeding and cancel all plans to turn the commercial FM spectrum into another "Citizens' Band" with its intolerable interference levels and lack of integrity.

Removing the 2nd and 3rd adjacent channel protection would totally destroy the ability of all Class A FM's to provide local service to their communities. The added interference would impair if not destroy the EAS emergency alert system, and render our local communities without adequate warning protection.

We provide service to two small communities, Bedford and Mitchell, Indiana, and it would not be economically possible to provide local service to these communities if our coverage were impaired by additional interference, which would result in decreased advertising revenues, which support all our local activities, not to mention additional competition for those ad dollars from new operators that might not be held to the same standards that we are held to.

There are available additional frequencies in the non-commercial end of the FM band, and these frequencies could and should be used for legitimate local needs before considering the destruction of the commercial band.

In addition to the above mentioned concerns, it is apparent to me, as an engineer, after some analysis, the future development of In-Band-On Channel Digital Broadcasting for the FM band will be an impossibility without 1st, 2nd, and 3rd adjacent channel interference protection.

This spectrum protection and band integrity is one of the primary duties of the FCC, and you cannot merely ignore your duty.

Respectfully submitted,



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