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Before the  
Federal Communications Commission  
Washington, D.C. 20554

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*Executive Director*

In the Matter of  
Proposal for Creation of the Low Power FM  
(LPFM) Broadcast Service  
Docket No. MM 99-25

To: Federal Communications Commission

Comments of  
Virginia Voice for the Print Handicapped  
Richmond, Virginia

Virginia Voice for the Print Handicapped is a radio reading and information service for the benefit of individuals throughout Central Virginia who are unable to read for themselves because of blindness, visual impairments and/or other physical disabilities. Each day the Virginia Voice broadcasts volunteers' readings of newspapers, magazines and books as well as newsletters, flyers and various other publications of organizations and agencies serving people who have disabilities.

These specialized readings are broadcast over the subcarrier of Richmond, Virginia's public radio station, WCVE-FM. Subcarrier (SCA) radio receivers are required for reception of these broadcasts. We provide these receivers on a loan basis to eligible applicants.

Statistics of the Virginia Department for the Visually Handicapped and the Virginia Department of Rehabilitative Services indicate that in Central Virginia there are approximately 9,000 individuals who need this special type of service in order to be able to access the printed page. Currently the Virginia Voice serves some 2,000 of these "print handicapped" individuals,

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Comments of Virginia Voice to Federal Communications Commission  
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and we continue our efforts to obtain the necessary funding and technical means for making this service available to all eligible individuals in this area.

Our listeners depend each day on the service of the Virginia Voice in order to maintain contact with their world and to carry on their lives as informed, educated citizens, having access to same information as the rest of us. Therefore, we have a great deal of concern regarding the proposal for creation of low power FM (LPFM). Subcarrier broadcast is, of course, fragile and marginal; however, both from a technical standpoint and a monetary standpoint, it is the means by which some 150 radio reading and information services around the country must, for the foreseeable future, continue to meet a real and otherwise unmet need. We have become convinced that the advent of LPFM would put subcarrier broadcast in serious jeopardy. It is clear that the operation of an LPFM adjacent to the frequency of a subcarrier service such as ours would create serious interference. We fear that LPFM could spell the end of subcarrier utilization for the provision of radio reading not only in Central Virginia but throughout the United States.

It is very important that radio reading and information services maintain a viable and reliable means for transmitting our services over the air waves to those citizens around the country who are "print handicapped." It is highly probable that LPFM would create serious interference with these transmissions. Therefore, Virginia Voice for the Print Handicapped requests the Federal Communications Commission not to adopt the LPFM proposal.

Thank you for your consideration of our concerns.

Respectfully,



Nicholas B. Morgan  
Executive Director

*Submitted July 30, 1999*