

Comments re: FCC 99-6 Notice of Proposal to authorize Low Power FM Radio Stations (released February 3, 1999)

1. LP1000 Stations: If this category is to serve in part as an "entry level" means for certain applicants to gain the experience necessary for a later move to full power status, then I feel that the operating requirements should be reasonably similar to those of a full power station, possibly requiring a regular broadcast schedule of some minimum days and hours, with the same commercial options as a full power station.

2. LP100 Stations: The crucial question for this category is whether the channels will be assigned to applicants with a primary interest in some form of communication, or to those with a basically commercial objective. To assure the widest participation LP100 stations should be permitted some limited amount of commercialization (as noted in Item No.69 of the proposal) so that those unable to afford the continuing operation costs would not be excluded. One possible plan might be to limit "non-program" material on a per hour basis:

Commercials:	Four minutes each hour
Other non-program material:	Two minutes each hour

No "carry-over" would be permitted of any unused portion of the allotment from one hour to another. Thus the maximum non-program time in any one-hour period would be ten percent.

3. Item #9: Parties with a vested interest