

Before the  
Federal Communications Commission  
Washington, DC 20554

In the Matter of: )  
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Creation of a Low Power Radio Service ) MM Docket 99-25  
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To: FCC / Mass Media Bureau

Reply Comments in regards to MM Docket 99-25

Submitted by: Americans for Radio Diversity (ARD)

Americans for Radio Diversity (ARD) is a nonprofit organization, composed of concerned radio listeners and consumers, dedicated to promoting community orientated public and commercial broadcasting. In interest of this purpose, ARD submits the following comments in response to comments currently filed in the MM 99-25 proceeding.

Response to Comments filed by US DOT/FAA, Mr. Gerald Markey, on June 1st, 1999.

In the Federal Aviation Administration's comments cited above, Mr. Markey claims that "many of the antennas authorized under this proposed rulemaking NPRM would be located near airports or other FAA facilities."

Mr. Markey, however, fails to demonstrate the physics binding FAA facilities and low-power radio operations. Regardless of how cheap real estate might be under excessively noisy flight-paths, the vast amounts of open land not in proximity to air travel operations make this argument border on the absurd.

Mr. Markey goes on to describe how terribly sensitive the Instrument Landing System receiver is and intimates that FM broadcast interference is capable of causing "serious incident." He makes this claim with the utmost sincerity while it is daily observable that planes stay in flight, full of passengers, even while traveling over broadcasting towers hosting multiple 100,000 watt transmitters. Mr. Markey does not show how a transmitter of exponentially lower power could cause such dire interference and therefore his argument must be disregarded as a simple scare tactic. Indeed, if the FAA's flight equipment is so poorly constructed, a federal inquiry into flight safety should be conducted posthaste.

Sincerely,

Jeremy Wilker, co-founder Americans for Radio Diversity

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