

Reply Comments docket 99-25
Low Power FM

Dear Sirs;

I would like to re-affirm my comments in support of the Commission's Low Power FM initiative. The new round of large mergers and buyouts that have recently been announced in my mind underscores the arguments that I presented in my earlier comments. I therefore whole heartedly support the Commission's proposal to have a low power service.

A number of the commenters have alluded to the possibility of interference to either the current analog FM signal, or the proposed digital fm (iboc) signal. I would like to make the following observations in response to their negative comments.

It is not possible to prevent interference. The current allocation standards using the F50/50 and F50/10 signal charts are a plan that sets interference levels at a certain point (the 60 dbu signal contour). The proper role of the Commission is not necessarily the prevention of all interference, but is the proper apportionment of interference so that the greatest public good is served. None of the commenters addressed this issues of how much actual interference will be noted versus the gain in service from the proposed new FM signals.

The NAB (and other groups supporting the interest of full power broadcasters) have opposed every major new initiative in the broadcast field for the last 20 years. Each time they have presented pages of evidence purporting to prove that the proposed new service would create terrible interference and ruin the broadcast industry. Time has proved them wrong on every account and I submit that their current showings should be given the same consideration as the boy who cried wolf.

The IBOC digital FM technical proposal is just that – a technical proposal that has yet to even gain the status of a rule making. It is not appropriate that the Commission should give IBOC the same consideration or status as an established service. Not all of the broadcast community supports IBOC, nor is it evident what if any benefits it may have for the public. I for one plan to strongly oppose it on the grounds that it is a costly process without any readily discernable improvement in audio quality. Based on information given by the IBOC manufacturers, it also is likely to reduce station coverage areas creating huge economic disruptions in the FM band while also being subject to all kinds of undesirable multipath effects.

Even if a substantial amount of interference were to be generated by a few LPFM stations, that would not necessarily be a reason to not adopt this new service. Given the clear benefits of the proposed service it seems more reasonable to create the service and attach to it an interference amelioration process similar to the one now employed with high power FM's and translators. This way we could have our LPFM stations while at the same time addressing the interference that "might" happen.

Peter Morton