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

AMERICAN
FCC

In the Matter of)
)
Reply Comments)
Low Power FM)

Docket # 99-25

Reply Comments
August 27, 1999

This is in reply to the Federal Communications Commission's proposed Low Power FM service (docket 99-25).

I feel that Low Power FM would be a tremendous service to the public, and could be initiated so that it does not create interference to full-power FM stations or to future digital FM.

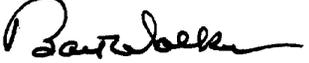
Instead of changing adjacent channel regulations, I propose that the Commission use the current **FM translator** regulations. This places the new LPFM service under rules that is currently enforce and accepted as not causing interference.

I feel there are two groups who should be considered for these Low Power FM stations: (1) individuals and community service groups, and (2) AM stand-alone operators. Growing population and expanding city limits leave AM stand-alone stations with inadequate service to their "city of license". The AM stand-alone licensees should be considered only if they have NO OWNERSHIP in any FM station that puts a city grade signal over the stand-alone AM station's transmitter site.

I feel it is important not to consider changing adjacent channel FM band interference regulations until all of the stations that can be allocated under current FM translator rules are licensed. Also, it is suggested not to consider a change in adjacent channel interference until this new LPFM service proves to be a service to the public and proves that no harmful interference is given to full-power FM service. Introduce the new LPFM service at this time under the already approved FM translator engineering regulations.

In conclusion, I propose that current FM translators be "grandfathered" and their owners have the choice of either (1) originating programming, (2) broadcasting a stand-alone AM station that meets the stipulations outlined in the above paragraph or (3) continue to operate as an FM translator.

Respectfully Submitted,



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