

To: Office of the Secretary
Federal Communications Commission

RE: Docket # 99-25

From: Vartkes Dalalian
1545 N. Verdugo Rd. #114
Glendale, Ca 91208

August 25, 1999

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AUG 27 1999

FCC MAIL ROOM

Dear Secretary,

Enclosed is original and nine copies of my comment regarding Docket # 99-25. Please kindly circulate the copies to the Commissioners for their consideration.

It wasn't until yesterday when I discovered that the FCC is accepting comments on the subject and that is why my comment is late. I do appreciate if you can make an exception and accept my comment as filed in a timely manner.

Looking forward to having my document accepted for filing and circulation.

Very truly yours,



V. Dalalian

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To: Federal Communications Commission
445 12th Street
SW, TW-A325
Washington DC 20554

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From: Vartkes Dalalian
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Glendale, Ca 91208

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FCC MAIL ROOM

Comment

Dear Commissioner,

Yesterday, it came to my attention that the FCC is considering the licensing of Low Power FM stations in the near future. Immediately after receiving the news, I viewed the FCC's Internet page to obtain additional information on the subject and discovered that the Commission is accepting comments in that regard. Unfortunately, I also discovered that the deadline for filing public comments was August 1, 1999.

Even with the passage of the unfortunate filing deadline, I decided to write to the Commission, because I believe that this long waited issue deserves some attention which over the years was being shadowed by broadcasting corporate giants driven by large profit motives.

LPFM is a great idea for individuals, minority groups and organizations to enter the communications field. Presently, most stations specially in big markets are owned and operated by giant profit driven corporations.

In this regard, during 1993, I contacted several engineers in the field to assist me in conducting a research and preparing a report to be presented to the FCC, proving that low powered FM stations can legally exist and be sandwiched between the high powered ones without causing any interference to them. At the time, most of the engineers I spoke to advised me that I can never succeed convincing the FCC as long as the corporate broadcasting giants oppose the idea because they might loose a portion of their markets to the newly established small stations and that the interference issue was only a cover-up to the real problem.

During that same period, I even contacted the FCC on this subject and several of the people I spoke to at the Washington office, told me that I can legally own and operate a station in my area only if I can afford to buy one because no licenses were being issued at the time, and when I mentioned the high prices at which stations were being bought and sold, one of the employees made a joke and told me that FM now stands for "For Money" and not "Frequency Modulation".

LPFM is also ideal for many minority ethnic groups where they can reach their immediate surroundings in their own language educating their fellow immigrant countrymen and preparing them to become ideal citizens equipped with the necessary knowledge needed to face the next millennium in this country.

LPFM stations can be started with low and affordable budgets but the quality of the signal should never be compromised. The FCC should have lesser station operation regulations and requirements for the LPFMs.

It is appropriate here to mention that several countries do have legal low power stations and no serious interference complaints are being reported.

Many broadcast enthusiasts are operating unlicensed small stations (pirate) because that is the only option they can resort to. Once LPFM becomes reality, It is my belief that no individual will try to establish a Pirate station when they can legally apply and obtain a license for a certain fee for their small station. By licensing LPFM stations, the FCC will generate more revenues from licenses issued and will solve the Pirate Station problem.

I believe that LPFM station licenses should be issued to individuals or organizations and should not be restricted to only one type of entity and stations should be allowed to advertise to a certain degree to generate the revenues needed to cover the operational expenses.

To deter the less serious interested parties, the FCC should require that all applicants for LPFM stations should attend a basic introductory class in operating FM stations(similar to the ones offered at community colleges) or a test should be passed before individuals can apply for LPFM station licenses and that a non-refundable fee should be paid with the submission of the application. Without any such restrictions, most pirate station owners, operators, broadcast fans and even disc jockeys will apply for a license.

Looking forward to seeing that LPFM becomes a reality in the near future.

Very truly yours,



V. Dalalian