

September 1, 1999

RECEIVED

SEP 01 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

DOCKET FILE COPY ORIGINAL

**BY HAND**

Secretary  
Federal Communications Commission  
Room TW-A325  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

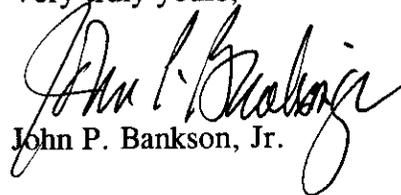
Re: MM Docket No. 99-25  
Low Power FM Rulemaking  
Reply Comments of CUE Corporation

Dear Ms Salas:

We are filing the original and four (4) copies of the Reply Comments of CUE Corporation in the above captioned matter.

Please stamp the enclosed copy of this filing as received and return it to our courier.

Very truly yours,

  
John P. Bankson, Jr.

Enclosures

JPB/jb

DC2669171

No. of Copies rec'd 0-4  
List ABCDE

Before the  
Federal Communications Commission  
Washington, DC 20554

RECEIVED

SEP 01 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
)  
Creation of a Low ) MM Docket No. 99-25  
Power Radio Service ) RM-9208  
) RM-9242  
TO THE COMMISSION )

**REPLY COMMENTS OF CUE CORPORATION**

Cue Corporation (CUE), by its attorneys and pursuant to 47 C.F.R. § 1.415(c), files its reply comments in the captioned rulemaking proposing a new low power FM (LPFM) radio service.

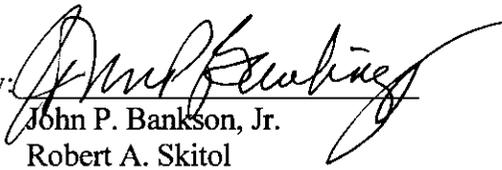
1. CUE provides vital communication services to over 180,000 long haul truckers which depend on the use of sidebands of approximately 600 FM stations throughout the U.S. CUE recognizes that subcarriers of FM channels are secondary to main channel FM operations. CUE is aware of engineering analyses filed with the Commission in the above docket which make an irrefutable case against the proposed LPFM radio service. CUE urges the Commission to heed them and reject all proposals for a new LPFM service.

2. Proponents of a new LPFM service, inter alia, urge the Commission to delete second adjacent channel separation requirements, an admission that LPFM is an interference threat to authorized FM stations everywhere. With existing FM subcarrier receivers, there will be interference to data transmissions on the CUE Network if proposed LPFM stations broadcast on frequencies closer than the second adjacent channels of FM stations on the CUE Network. The long haul truckers depend on the CUE Network for essential information on traffic and weather conditions. The CUE Network has provided this public interest service since 1984.

3. The expected interference to the operations of the CUE Network is an unintended consequence of LPFM proposals to delete second adjacent channel separation requirements. The public interest in CUE Network service to long haul truckers should be weighed with all other factors in this rule making. The Internet, which has limitless potential to fulfil the stated objectives of the proponents of LPFM radio service without impact on the CUE Network and existing FM licenses, is the answer to the needs of these proponents, not a new over-the-air LPFM service and the comprehensive interference expected.

Respectfully submitted,

CUE CORPORATION

By:   
John P. Bankson, Jr.  
Robert A. Skitol

Drinker Biddle & Reath LLP  
Suite 1100  
1500 K Street, N.W.  
Washington, D.C. 20005  
(202) 842-8800

Its Attorneys

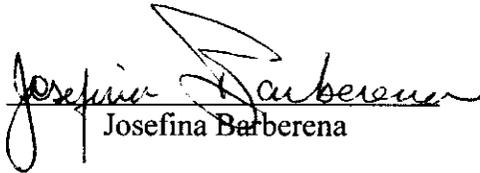
September 1, 1999

Certificate of Service

I, Josefina Barberena, hereby certify that on September 1, 1999, a copy of the foregoing Reply Comments of CUE Corporation was served by hand on the following:

Ms. Judy Boley  
Federal Communications Commission  
The Portals  
Room C-1804  
445 – 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Mr. Timothy Fain  
OMB Desk Officer  
10236 NEOB  
725 – 17<sup>th</sup> Street, N.W.  
Washington, DC 20503

  
Josefina Barberena