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FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

In the matter of Creation of a Low Power Radio Service (MM Docket No. 99-25)

To the Commission:

Capital Public Radio, the FCC licensee of public radio stations KXPR/KXJZ in Sacramento, California, submit these Reply Comments in the above-referenced proceeding on LPFM.

We strongly support the initial Comments in this proceeding filed by the Public Radio Regional Organizations (the PRROs"), the Station Resource Group ("SRG"), the Corporation for Public Broadcasting ("CPB"), and National Pubic Radio ("NPR").

Based on our understanding of the initial Comments of the public radio industry groups, LPFM will adversely affect public radio, in that it will result in (i) the introduction of an intolerable level of new interference throughout the FM band, with public radio bearing the brunt of the effects of new interference because of its typical program modulation; (ii) jeopardization of the substantial federal, state and private investment in public radio; (iii) an unknown (and unknowable) impact on public radio conversion to digital audio broadcasting; (iv) loss of existing public radio FM translator and satellite/repeater service; (v) potential loss of subcarrier services, particularly radio reading services for the print disabled.

We urge the Commission not to sacrifice our public radio stations and our public radio listeners for the illusory benefits of LPFM. We urge the Commission to look for alternate ways (outside the FM band) to accommodate the proponents of LPFM, if it believes any such accommodation is appropriate. We ask the Commission to pay heed to the Comments of our public radio industry groups (PRROs, SRG, NPR, and CPB) and to treat those views as our views in this proceeding. We request that the Commission review with care the "listening tests" on the CD ROMS submitted with NPR's Comments – those listening tests document the intolerable interference that LPFM will cause if authorized as proposed in this proceeding.

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We state unequivocally our firm belief that the record in this proceeding does not support the creation of LPFM in the FM radio band.

Respectfully Submitted,

Carl Watanabe

Carl Watanabe
Station manager

August 31, 1999