

Please Note: These comments were originally filed on 2 August 1999 via e-mail to the ECFS. They never appeared, and it was difficult to reach anyone about the problem before I went out of town. Later I was told that there had been a problem with the e-mail function at the time my message was sent, and that I should call the secretary's office, which has not responded to my calls.

I feel that these comments contain technical observations which may be valuable in deciding how to best implement an LPFM service, and hope that you will still give them full consideration,

The commission is to be congratulated on your willingness to recognize the need for low-power broadcasting. It is my hope that my comments will be useful data in your decision-making process about the myriad of complex issues relating to its implementation.

My perspective on this is that of a former commercial station owner (WOSC-AM 1300 in suburban Syracuse, NY), manager, chief engineer and life-long radio enthusiast. I feel that objectivity is important in weighing the competing interests, and that past trends should be examined in predicting possible outcomes of different policies.

I am not, and have never been a "pirate" broadcaster, although I've met some and discussed their perspectives on broadcasting. Their views, although sometimes more extreme than most, often echo the frustrations of other radio hobbyists, members of the general public and commercial station employees in relation to the current state of the radio broadcast industry.

On the other hand, I do not share the blind disdain for all current broadcasters which has been expressed by some in the "community broadcasting" movement. Having been a commercial station licensee, I am quite sensitive to the issue of safeguarding the legitimate interests of broadcasters and the importance of protecting the large investments they have made in full-power stations. Only a properly implemented LPFM service can create necessary community services without allowing unfair competition or interference to existing stations.

As the NPRM raises many issues and requests comment on most of them, I've broken them down by issue, and will try to address issues in order of their first appearance in the NPRM.

Second and Third Adjacent Channel Rules:

This is one of the technical issues which is raised in almost every aspect of the NPRM, including the commissioners statements. Such attention is appropriate, as this is a pivotal issue in the creation of an LPFM

service. If both second and third adjacents were restricted, there would be almost no available channels for LPFM in most populated areas. Similarly, the commission would not want to create a service which would cause objectionable interference with licensed stations, or which would receive enough interference as to be unavailable to most potential listeners.

While the concerns of the commission are justified, I have no hesitation in saying that in over 25 years of professional and/or personal experience it has become clear to me that these restrictions could be eliminated for LPFM's with absolutely no harmful effects.

Consider for a moment that changes in rules over time have resulted in a significant number of short-spaced grandfathered FM stations. Specifically, in the largest metro areas, second-adjacent spacing is common. I analysed the commercial-station spacings in 3 of the 10 largest CMSA's, Delaware Valley, Los Angeles and Washington-Baltimore in determining that 35% of the spacings between stations are second-adjacent, and another 12% are third-adjacent. These numbers are based on the stations which are in or near the cities and serve the metro areas. Even higher percentages of short-spacing by current standards would be found if spacings were considered between these stations and the outlying rural stations.

What this does is gives us a "laboratory" of existing second-adjacent stations to investigate. The stations with the second or third adjacents have not, in most cases, been considered poor-coverage stations. Many, such as WGAY, WPGC, WYSP, KBIG, KIIS and others have, at times, been market-leading, and are generally considered to be among the best in signal-coverage of their markets. Even the lower-powered second or third adjacents in the same markets have also been successful operations, such as KJLH, WMMJ or WWIN-FM. Far too many of these stations have thrived for one to readily accept the argument that they are suffering significant interference.

In my days as Chief Engineer of WMUC-FM, I got to experience a situation which is closely akin to that which would be common if second and third adjacent requirements were dropped from consideration in issuing LPFM licenses. We were a Class-D (10 Watt) station which was second adjacent to a strong local Class-B FM, WAMU. Although we had many listeners who would complain of losing us due to low signal-strength as they drove away from campus, we never had any complaints of any other station interfering with us. (Today another 88.1 has increased power and co-channel problems are common for WMUC.) Similarly, even in the building from which we transmitted, we never had any problems receiving WAMU on any radio we tried.

Both my radio profession and DX hobby have caused me to compare many radios' ability to receive stations. I have yet to find a properly-working radio of any kind which has interference between third adjacents. Second adjacent interference is restricted to the absolute poorest of radios, and is virtually never found on standard car radios or stereo systems. When it occurs, it is a only problem with widely discrepant signal levels, where a very strong station spills over a weak one. In the case of LPFM's, the area of extreme signal strength is tiny, and in the case of MicroPower, basically nonexistent. At the same time, most would be second adjacent to stations which are local, and thus strong enough to be the least susceptible to this rare type of interference.

Please keep in mind that some commentators on interference potential are opposed, for their own economic reasons, to the very concept of LPFM. While groups representing large corporate broadcasting interests or high-power non-commercial broadcasters may present their own technical analyses, you may want to accept these data in the same spirit as you would accept lung cancer studies from the tobacco industry.

Stories of interference from second-adjacent pirate stations are not valid indicators of how LPFM would work. How many pirates use only FCC type-approved equipment, with regular maintenance aimed at compliance with FCC rules? How many pirates strictly limit their modulation to 100%? How many pirates even have the equipment to be certain that their carrier frequency is accurate to FCC-required standards?

It should also be noted that the commission has licensed a special-case low power FM in Miami for tourist information. This station is 25 watts on 102.3, second-adjacent to WMXJ at 102.7. As well, the second-adjacent rules are commonly waived for grandfathered short-spaced stations, even in cases where a facilities change increases the amount of signal toward the other station, and thus the overlap zone. In these cases, the commission and its staff must have determined that second-adjacent interference is not a significant enough problem to preclude these approvals. Consistency would be maintained if the commission used the same reasoning and standards in the case of creating the LPFM service.

Commercial vs. Non-Commercial:

Comment was requested on the issue of whether LPFM stations should be allowed to be commercial, and whether non-commercial stations should be given preference for frequencies. This decision is one of the most critical to the success and value of LPFM. Commercial broadcasting must be allowed.

While certain types of community service are best provided by non-commercial broadcasters, others are only

likely to come from the free-market. Non-commercial, non-profit broadcasting often is originated by those who feel that they have a product which is "good for people," rather than being directly responsive to the demands of the community. Such programming can have legitimate artistic, informational or spiritual value, but is also frequently politically biased and designed for an extremely small audience segment.

Commercial LPFM broadcasting would, in most cases, respond to the needs of the community, lest it be unmarketable. These needs may be for news, announcements, sport, entertainment, localised weather and traffic or practically any aspect of radio programming which is not already being addressed by the larger market-wide stations.

If a desire exists to reserve some allocations for non-commercial, I feel the best way to do it would be by setting aside a part of the FM band for this purpose -- but not the part you think!

The obvious solution would be to use the same non-commercial band as exists for full-power FM. Consider the advantages of allowing commercial LPFM's there, and reserving a different 4 MHz, in the upper-middle part of the band, such as 100.1 to 103.9. The intermingling of commercial and non-commercial caused by non-comm. LPFM at the top of the dial and commercial LPFM at the bottom may cause a larger segment of the audience to sample non-commercial radio.

Community Involvement/Audience Type

LPFM, if properly implemented, would encourage strong community involvement. Without the appropriate safeguards, this benefit could be completely lost. These would include some restrictions on ownership and programming.

Ownership needs to be strictly limited. The types of "efficiency" mentioned as arising from large station group are precisely the things which work against strong community involvement. Firstly, a group owner of LPFM's doesn't need as much local support. Under this worst-case scenario, stations over a wide area could be either simulcast or centrally programmed/automated, while having spots which were sold to large national companies on a group basis.

There is an assumption made in the NPRM which I feel needs to be countered. Audiences for LP100 and Microbroadcast services are predicted to be non-mobile. Nothing could be farther from the truth. Consider that a significant percentage of trips are local. For most people, their most-commonly-visited grocery store, movie theatre, gasoline station, shopping centre, and children's schools are just a few kilometres away in the same suburban town where they live. It is specifically the ability to listen to the community station in the car that would make this kind of service available to many busy people. Cable or Internet distribution require the

listener to be using specifically wired equipment in a specific room and are thus unavailable at most listening times. In-car listening is one of radio's primary benefits and would be likewise for LPFM.

As long as large-group ownership is not allowed, the ability to find a sustaining advertising customer base will be directly tied to an individual station's responsiveness to its potential audience. A responsive station will attract a following and would be of great advertorial utility to small local businesses or political candidates for local office. Currently small businesses are often shut out of radio advertising entirely because radio stations are mostly large, covering an entire market, and thus too expensive for an advertiser who doesn't benefit from market-wide advertising.

New Voices/Diversity/Ownership:

The concepts of "diversity" and "new voices" are frequently mentioned, and with good cause. Many markets are now at the point where a small number of large-group owners have taken over all of the radio stations. These groups often combine facilities, staff and policies for large numbers of stations. This has set back diversity to roughly where it was at the end of World War II, when each city typically had only four or five stations.

New voices on the radio dial bring new styles, formats and types of programming which may not be available from the mainstream full-powered broadcasters. In general, LPFM's will not directly compete with other stations, as their smaller service area and weaker signal would make it impossible to succeed with duplicative programming.

These new voices will also likely serve as fertile ground for the development of new talent, ideas and formats which could be brought into larger stations if the demand warrants it. Having smaller stations which are less expensive to operate, LPFM broadcasters are far more likely to experiment with new sounds and programming concepts.

Especially important is to prohibit ownership of more than one LPFM in the same area. Multiple LPFM's in the same location would run directly against the idea of creating the maximum number of new voices. Coverage overlap between co-owned LPFM's could result in their being run as a single business entity, rather than having each be fully responsive to its own community's needs. To avoid this, co-owned LPFM's should be spread by at least two times the required spacing for co-channel stations of their class, even though they may not be co-channel.

Primary/Secondary Status:

It is absolutely crucial that no LPFM (whether LP1000, LP100, Microbroadcaster, or Class-D) have secondary status relative to any other LPFM. The idea of LP1000 priority could easily destroy the entire LPFM concept, as one or two of these stations would take up

all of the limited spectrum space available in many markets. The result is that most cities would simply get one or two more seemingly "regular" FM stations which may have slightly inferior coverage but be otherwise indistinguishable from the rest of the FM dial.

Since a larger LPFM can easily take up the "footprint" of many smaller ones, have too many of them would greatly reduce each applicant's chances of obtaining a license to broadcast.

It would be optimal to make all LPFM's equal priority to each other, and of higher priority than translators. New full-power allocations should be allowed to interfere with LPFM's. Existing regular FM's would be able to change facilities with priority over LPFM's, such that they could cause interference to or frequency change for the LPFM, but could not cause an LPFM to cease broadcasting entirely.

Channel Usage:

In general, the NPRM is sensible in proposing the use of the existing FM band. It would be good, however, consider 87.9 available for Microbroadcasting. 87.9 was made available to 10-watt stations, although it has seen little if any use. Because it legally exists as an FM frequency, manufacturers of receivers have been including it in just about all models. Powers of more than 10 watts on 87.9 would have to be restricted to very large distances from channel 6 TV stations, beyond the normal interference contour protection.

Use of 87.9 would have to be limited to markets far from TV channel 6, but could provide valuable bandspace in these areas. A significant portion of the nation's population would potentially receive service from this addition, especially in crowded areas such as Los Angeles, Chicago, Washington-Baltimore, New York and many other similar places.

Classes of LPFM's:

The creation of the "Micro" class is critical, perhaps the most important part of the LPFM concept. LP100 would also serve certain needs in some communities. While Microbroadcasters should be allowed everywhere, LP100's would best be put in rural areas and outer suburbs of cities. In many markets, in-town LP100's have the potential to cover too large a percentage of the market's population and to become market-level competitors rather than community stations. This is most true in medium markets with concentrated population.

LP1000 seems like a problem. As proposed, the LP1000 stations would, in many markets, cover enough of the population that they might be more likely to compete with established stations than to truly provide new voices. A new station owner does not necessarily represent a "new voice" if the station's programming is indistinguishable from the standard corporately-designed fare

available on full-powered stations. (Proponents are not endorsing LPFM because they want another station offering a market-researched playlist of 350 super-hit songs known as "the best blend of the 70's, 80's and 90's!") LP1000 should not be implemented.

Furthermore, the spacing to accommodate an LP1000 is large enough that one or several of them in a market may take up all of the possible frequencies for smaller LPFM stations. The protected radius of one LP1000 could, in many cases, contain 5 or 6 LP100's or over 50 Microbroadcasters. This represents a number of student-run college stations, ethnic minority neighbourhood stations, community-oriented suburban stations or individually inspired creative outlets which would never find a place in the public-owned airwaves if LP1000's tied up this valuable space. If LP1000 has any place at all, it would seem like it should be restricted to very rural areas only, and only then where there is ample space for smaller LPFM's as well.

Spacing issues:

Spacing issues are examined in several contexts. As stated above, it would be optimal to disregard second adjacent and necessary to eliminate the third adjacent requirements.

If for some reason these adjacent requirements were not completely eliminated, then there should be a certain radius around the primary station where these LPFM's would be allowed. This seems opposite of the traditional strategy of separation to avoid interference, but it is perfectly logical - an LPFM within a few miles of a powerful station would be only be strong in a small area, where the full-power station is even stronger. Thus the full-powered station could theoretically interfere with the LPFM (but only for those with severely deficient receivers) and the LPFM would not interfere in any way, on any radio, with the traditional broadcaster.

Similarly, the LPFM spacing should be such that LPFM's can accept but not cause interference. Since an LPFM is designed as small-area station, have a smaller interference-free coverage zone would, for most LPFM broadcasters, still be greatly preferable to not being able to broadcast.

The proposed LPFM spacings should, however, be modified to protect existing co-channel and first-adjacent FM's better than they do. Despite an official protected contour of 60 dBu for Classes A and C and 54 dBu for Class B, most stations have "de facto" protection which goes far beyond these boundaries. This comes from the fact that allocations are designed to neither cause nor accept interference. For powerful stations there is a large distance between the protected contour and the contour which is considered sufficient to cause interference.

For example, adjacent channel Class B's are spaced over 100 miles apart, while the protected contour is only 32 miles. At 40 or even 45 miles, the first adjacent station is generally quite weak and the closer station is often still perceived as "local." With 1-watt microbroadcasters, a co-channel station could be about 45 miles

away, i.e. in the current "local" coverage area. The solution is more strict co- and first adjacent channel requirements. To reflect reality, class B's should be protected from LPFM's for a 45 mile radius, class A's for 25 miles and Class C's for 70 miles.

Translators:

The NPRM asks about whether LPFM's could have translators. This would not seem advisable. LPFM is, by definition, a very localised medium. Translators could only distract from this basic purpose and would have great potential to be abused, in attempts to cover whole markets and use LPFM's like full-powered stations.

Current translator licensees who do not own full-powered stations should be automatically given the opportunity to convert them to LPFM's. This would replace a non-local service with a local one, a goal which the FCC has historically and logically supported. Furthermore, such translators have already been engineered, built, and shown not to interfere with other stations. Their conversion to LPFM could give some communities LPFM benefits almost immediately.

USA-Digital Radio's IBOC (In-Band On Channel) system:

Since USADR itself doesn't see a problem with local second adjacents, and they are the engineers and inventors behind the system, it must not be a problem.

In view of the fact that significant portions of the FM dial in most major markets are comprised of short-spaced, local, second-adjacent FM's, an IBOC system which would not work properly with strong second-adjacents would not be a feasible choice for the U.S. radio spectrum, with or without LPFM's.

For example, if one looks at the FM dial in the Boston, Los Angeles, Washington-Baltimore, and Philadelphia areas, roughly 30% of the FM stations have a local short-spaced second-adjacent station, and another 10% have a third adjacent. Of this 40% having shortspacing alternate channels, many have one on each side of them. For the same reasons that the system will work properly in these major regions, it will also work where the second-adjacents are LPFM's.

Effects on other businesses:

LPFM's can be especially beneficial to small businesses. Many such businesses are located in large metropolitan areas where only large chain stores who have many locations can efficiently use the popular market-wide radio stations for advertising, but the smaller businesses have had few or no options for radio advertising.

The benefits to other businesses are less tangible, but just as real. These extend primarily to the music industry, but also to related entertainment and supporting industries. Mainstream large stations generally play only music from major artists on major record labels, and then only after extensive market-testing of the songs. LPFM's, like existing low-powered college or

outer-suburban stations would be more likely to play music from new, unknown, or local artists and from independent record labels. Small businesses including independent record stores, labels, producers, nightclubs, etc. would have a valuable source of exposure in LPFM.

Because of the highly local nature of LPFM's, many new recording artists would initially benefit most in their home regions from the existence of LPFM stations. The overall effect would be positive for U.S. artists as a group. This is important because many nations having more regulated or nationalised broadcasting go to great lengths to promote their own artists.

The only possible detrimental effect, in the absence of adequate protection, is to the business of other radio stations. An LPFM service should not represent significant competition for licensed full-power stations. By limiting power, location, ownership and certain non-local programming, the LPFM service can be made to provide adequate flexibility for those interested in providing community radio, but make it impossible for an LPFM station to substitute for a market-wide station in a mainstream position.

The measures I would recommend for this purpose are divided into the three above categories:

- a. Power: The power levels allowed for LPFM's, in conjunction with their antenna height rules, will determine how localised they truly are. It would be desirable to have LPFM's which cover one or several specific communities, rather than entire markets.

It is crucial to realise that coverage of a market does not require the covering of the entire geographical area which comprises the market, and that FM audiences routinely listen to signals of less than 54 dbu in strength when there is no co or adjacent channel interference. Market coverage is achieved when substantial proportion of the market's population is able to hear the station on most of their radios.

This definition of "coverage" becomes important when one considers that an LPFM with 1000 watts, or in some cases with 100 watts well placed in the middle of town, has the potential to be a major force in a radio market. If LPFM licenses are granted which afford this opportunity, then it is likely that they will be aggressively sought purely for their financial value, rather than by those who wish to make a profit by working hard to address unmet community needs. As happened with LPTV, non-broadcaster businesspeople would be tempted with "business opportunity" ads from consultants wishing to prepare their applications for a fee.

Consider further that in many medium markets it would be possible to put an LP100 or 1000 station on a tall "downtown" building in the primary city. Such a station could, in many places, reach the entire city and most of the more populous inner suburbs with city-grade coverage.

The best solution might be a system of maximum power level based on city size. Under this system, an LP1000 could not be in the primary city of a metropolitan area (or any primary city of a CMSA) or in any city whose census boundaries have adjacency with that city, or in any location within 15 miles of the main post office of that city. LP100's could not be in the primary city or within 9 miles of the main post office. Microbroadcasters would not be restricted under this rule.

b. Transferability:

In order to insure that applicants are actually those who want a broadcast voice, and not those who simply plan to sell the C.P. or recently built station, some limits should be placed on transfers. A C.P. should not be transferable except in the event of death, bankruptcy or between corporate entities of substantially the same ownership. Once on-air, the station should operate for at least two years before voluntary transfer.

The old rule requiring three years between voluntary transfers worked well, and kept owners focused on the long-term and on building community relations which would keep them successful. Such a rule would help maintain the spirit of LPFM, while encouraging these stations to use strategies which are different from those used by full-powered stations.

c: Programming:

Although the FCC cannot mandate specific programming content, there are programming questions such as: local origination requirements, public service obligation, simulcast rules, satellite-delivered programming restrictions, etc. which can be subject to FCC requirements. The commission proposes essentially no restrictions except for a prohibition of simulcasting a full-powered station.

While the full-power simulcasting requirement is a good start, it is far from enough to insure that LPFM licenses are not abused. Firstly, LPFM's must be prohibited from simulcasting each other. An LPFM simulcast would be counter to the idea of creating new voices and diverse community stations. It could easily and would be used to make a string of LPFM's into a market competitor, having the characteristics of a full-powered station.

Without a local origination requirement, LPFM's could easily satellite-fed "drones" with local ID's played by automation. This would create a less local, and less diverse service than existing broadcasts. Since listeners would lose some ability to receive distant stations, having the same networked programming at several spots on the dial would actually reduce the number of programming choices for these listeners -- exactly the opposite of the intent of creating LPFM.

I propose the following definition of local origination:

"Programming is local when it is live or recorded exclusively for airplay on a specific station. Recorded music is local when played in real-time by personnel at the station or when automated by the station, such that in neither case is the music selection made in such a manor that would result in substantially the same musical selections being played in similar proportion and order on other stations"

While this sounds complex, it basically allows DJ's to play music locally or to automate it for one station, but does not allow fully syndicated or packaged programming to be considered local.

Local programming would then be required to be at least 85% of a station's total broadcast hours in the average week, with exemptions for hourly network newscasts. This would still allow a station to use some syndicated feature programmes to complement its format of local programming, up to about 25 hours per week for a full-time station. By using the average week, stations could periodically exceed the limit for special events, holidays, sporting events, etc.

Obviously, all network and simulcast restrictions would need to be automatically and temporarily suspended in the event of local or national state of emergency.

Character qualifications:

In general, the qualifications for licensees of full-powered stations can be applied to LPFM's. A specific exemption should be considered for some ex-pirate broadcasters. Those who interfered with licensed stations (or public service communications) and did not cease to do so when warned should be ineligible. Similarly, those who broadcast profane, obscene or libelous programming should be disqualified.

Failure to make such an exemption may cause many of those who have worked hardest over the course of many years for the establishment of LPFM to be left out of it. Perhaps it is time to "bury the hatchet" and allow a long-needed understanding between community broadcasters and the FCC. When you consider how many "pirates" have requested licenses, STA's, experimental permits, etc., it is reasonable to think that many would happily be operating within the law if it were possible to do so. Under current rules, there is no provision for community broadcasting on a scale that individuals or small groups can enter.

It should also be noted that licensed operators will not tolerate interference from unlicensed or improper operation by others. Having available dial space filled with licensees will aid the commission in keeping the FM band clean and keeping unlicensed broadcasting to a minimum.

This is a time when we can look upon past "pirates," (those who did not spew profanity or interference) as protesters who practiced civil disobedience rather than as serious criminals who should be

scarred for life.

Issuance of licenses:

There are several different ways that LPFM licenses could be issued. One possibility is that mutually exclusive applications would be considered on a first-come, first-served basis; whereas another system would create short filing windows for various frequencies or locations and would use auctions, lotteries, etc. to resolve conflicts.

The system of filing windows is inherently superior. A first-come, first-served system favours those who have resources to get an application in at a certain moment. Whether this is a faster Internet connection or a communications lawyer waiting outside the FCC's door in the morning when it is unlocked, it does not show the worthiness of the applicant in any way.

A lottery would be fair to all who filed. Some other ideas which could speed resolution of mutually-exclusive applications:

- a. If applicants not in the exact same location wish to build lower powered LPFM's instead of competing, this should be allowed and favoured.
- b. If applicants in substantially the same location agree on a shared-time plan this should also be allowed and favoured.
- c. If applicants agree to move one or more of the mutually-exclusive stations, this should also be allowed and encouraged.
- d. If there are several applicants, those who reduce conflict by the methods in a, b and c above should have preference over those who don't. In the end this will bring the greatest number of new voices to the airwaves and leave the fewest applicants without stations.

Hours of operation:

LPFM's, like others using the limited resource of spectrum space should be required to have regular hours of operation. If these hours are fewer than 16 per day (averaged across the week) and are not a full seven days per week, the station should be subject to shared-time applications for their frequency.

All LPFM's should specify hours of operation in their application.

While Shared-Time operation may not be a popular concept these days, consider that some high-school stations may only want to be on-air on weekdays, some community stations may only want weekends and/or evenings, etc. This would provide for efficient use of the spectrum and would maximise the diversity of voices, styles, and ideas available on radio in a given location.

Renewal:

Renewal expectancy is as important for LPFM's as for any station. Without this, the entire idea of LPFM should be abandoned. Renewal should be simple, or preferably automatic, unless there are issues of violations which would cause closer scrutiny to be required. When one considers how infrequently non-renewal has been an issue for full-power broadcasters, and how often challenges to renewal have been frivolous or malicious, it becomes clear that spending time on deciding whether or not to renew any given LPFM would be a waste of public resources.

With all due respect, I should point out the concept of non-renewable LPFM licenses is the singularly worst idea which I've ever seen emanate from this commission which has generally been such a careful steward of our public spectrum resources. Imagine the resentment toward the FCC and the government in general when station owners and listeners, after several pleasant years, feel that the authorities are taking away their radio stations. To create stations which would gain a following as well as training their owners in the needs and desires of the community, and to then shut them down is an absurdity of epic proportions.

Call signs:

Call signs should be of standard form. To do otherwise would stigmatise the new stations. From the point of view of an average listener, a station without a "normal" call sign may lack credibility.

Possible shortages of callsigns could be alleviated by allowing four-letter calls starting with N or A, allowing new three-letter calls, and possibly by allowing limited duplication as follows:

- a. Eastern states which border the Atlantic would have LPFM's starting with "K", but explicitly excluding the grandfathered "K" calls in Pittsburgh and the existing "K" calls of Class 1 AM's.
- b. Western states which border the Pacific would have LPFM's starting with "W", excluding existing calls of Class 1 AM's.
- c. For record-keeping purposes, all such stations would have the suffix -LF, but would not be required to use it on the air.

In closing:

The FCC has been, since its inception, presented with an unenviable paradox -- regulate broadcasting in the public interest without regulating programming in any way. Proper implementation of LPFM will allow the marketplace to respond to community needs and improved the opportunities of listeners to hear and broadcasters to provide programming which is unavailable today. This will be an exciting new service.

...Sam Brown