

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the matter of)	
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)	
Creation of a Low)	MM Docket No. 99-25
Power Radio Service)	
)	RM-9208
)	RM-9242
)	
To: The Commission)	

**COMMENTS
OF
Robert N. McCord**

As the decision on Low Power FM nears, it appears the subject of a commercial versus non-commercial service, has become a dominant issue. Meanwhile, it's ironic that the radio industry continues to rack up major gains in sales and profits, and broadcast property prices continue to soar. Those of us who are broadcast professionals, who served many years in the industry, are happy to witness this new level of success. Radio, in the past, was often given short shrift by agencies and advertisers. What many of us object to, is the NBA's attitude that those proponents of LPFM should not be able to seek out revenues to provide a worthwhile service. This can only be construed as an anti-free enterprise perspective. "We're making money now let's close the door."

For a broadcast operation to provide even adequate service, it must have supportive revenue, either through advertising or fund raising. It seems unreasonable that the FCC should have to decide who should act as financial competition for a Low Power service, college and public radio operations or private broadcasting? The simply answer should be, neither.

LPFM entrants would furnish information to small communities that have often been abandoned by operators who re-broadcast programming from other centers. It would also create a platform for small retail and service businesses to be able to get their message out to their customer base. If a service were to be licensed in Laguna Beach, it would make radio advertising a possibility for numerous business for the very first time. I have talked to restaurant owners, small retailers, law offices, and veterinary clinics who are excited about being able to reach their customers with radio. They can't afford to do it today. The cost of a spot on virtually any LA radio station would be out of the question.

Technological advances have given radio the ability to target it's signal in a tightly defined geography. The rules that applied several years ago are no longer relevant. The opponents of LPFM would have us believe that we cant introduce new services without wholesale havoc and interference. With todies directional signaling its within our power to provide service to specifically defined areas with no infringement on adjacent services. Therefore, both the 2nd and 3rd adjacent channel restrictions must be dropped for LPFM stations.

Class LP-1000 stations should include stations from 1,000 watts down to 200 watts, as long as engineering proves no interference using the "prohibited contour overlap". These stations should be "primary status" and protected to their 1 mV/m (60 dBu) contour.

Class LP-100 stations should be designed to fit in where LP-1000 stations will not fit, even using

directional antenna patterns kept in the FCC database. These stations should be "secondary status" with a minimum of FCC rules to adhere to, mainly technical rules to prevent interference.

The Commission is to be congratulated on creating this forum for Low Power FM. It has become an issue that has captured the imagination and interest of so many Americans. We look forward to a decision that will encompass the criteria that allows this service to provide a truly significant contribution to communities everywhere.

Thank you for the opportunity to express my views on this matter.

Yours sincerely,

Robert N. McCord