

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC

In The Matter Of: )  
 )  
Establishment of a Low Power Radio ) MM Docket 99-25  
Service )  
 )

**REPLY COMMENTS OF THE ARIZONA MICRORADIO ASSOCIATION**

In this filing, we will respond to some of the Arizona based organizations commenting on the Low Power Radio Service.

**Sun Sounds Radio Reading Service/KJZZ**

There seems to be some confusion over a statement made by some commenters including REC Networks and the Arizona Microradio Association (AzMA) regarding subcarriers. REC and AzMA are willing to allow the Commission to prohibit the use of SCA services for **LPFM stations only**. We do not wish to see any full power station, either non-commercial or commercial be prohibited from using their SCA capability. We commend Sun Sounds on the great service they provide to the people here in Arizona and in our recommendations for interference protection, we have taken into consideration services such as Sun Sounds.

**Art Laboe - KXEW, et al**

In Art's comments, he states concern about the large number of stations that would be possible in the Tucson area. We can understand the concerns he states about injecting as many as 34 LP-100 stations in the market at one time. This is a reason why we need

frequency coordination for LPFM stations. Through proper frequency coordination, LPFM stations can be spread around a community as well as use the least number of frequencies as possible. For example, here in Phoenix, we have one channel (286) which we can fit 8 LP-100 (A3) stations on, all in different portions of the community. In Tucson, which concerns Art, AzMA's bandplan calls for 12 LPFM stations for 12 different portions of Tucson. Of those stations, 3 are LP-100 (D1) stations and the other 9 are the Amherst proposed "transitional" LP-250 class (REC Class A2). In addition, AzMA has pre-coordinated every public high school in the Tucson. Most of these stations were pre-coordinated on Channels 295 (106.9) and 294 (106.7). Channel 198 (87.5) is not available since there is a local Channel 6 station in the community. AzMA feels that if the service remains non-commercial as proposed by REC Networks and others, there will not be a rampage to place 30+ stations in the Tucson area as suggested by Laboe. *AzMA intentionally did not pre-coordinate any LP-1000 stations in the Tucson area.*

### **KAZM(AM)-Sedona**

In KAZM at 3, they claim that LPFM stations will fail and will eventually be "scooped up" by larger conglomerates. AzMA feels that LPFM will be licensed to community based and oriented organizations. REC Network's proposals call for stations to be locally owned and operated with very strict ownership limits. AzMA feels that a majority of the licensees of LPFM stations will be school districts and we do not see any of them going out of business any time soon. In the event that a station fails, the license can be assigned to an individual or organization who does not have any other mass media holdings (or

any other LPFM station) or the license will be cancelled, the station deleted from the database and the channel would be available again for re-assignment.

**Anthony James Kelly**

AzMA agrees that our Native American tribes should have access to their own radio stations. Even though some tribes, such as the Navajo Nation does have full powered stations, we have many tribes which can not provide their own broadcasting service as a result of location. Tribes which are located near the Metropolitan Phoenix area such as the Fort McDowell, Gila River and Salt River-Maricopa Indian Communities can not place minimal Class A stations, not even in the reserved band, due to it's proximity to Phoenix yet these reservations have their own special needs that Phoenix radio is not capable of covering. In AzMA's revised bandplan, we have pre-coordinated stations for each of these communities as well as census designated places in other Indian communities across the state.

We once again stress the importance of the restrictions on LP-1000 (A1) within 100km of the Top-100 Media Markets (including Phoenix) as well as restrictions on LP-250 (A2) within 100km of the Top-50 Media Markets (which also includes Phoenix).

We also stress the importance of the availability of Channels 198, 199 and 200 (87.5 through 87.9) in areas where interference to TV Channel 6 is not an issue. Here in Phoenix, being able to place our 10 watt stations on these channels will reduce the need to place these stations in the non-reserved portion of the band.

Respectfully Submitted.

Richard-Michelle Eyre for  
The Arizona Microradio Association  
P O Box 2408  
Tempe, AZ 85280-2408  
azma@m-3.com