

Before the  
Federal Communications Commission  
Washington DC 20554

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In the Matter of  
New LPFM Class Creation  
Docket 99-25

September 14, 1999

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**Comments of Vartan Missirian**

I do support the creation of a new Class of Low Power FM. LPFM stations can better serve the communities they are located in than the major stations owned and operated by profit driven media giants that are accountable to their shareholders rather than the communities they serve.

LPFM stations are ideal for small communities, organizations, events and minority groups. I as an immigrant, would like to see the approval of the proposal and the creation of such a new class because a LPFM station can greatly serve the members of my community who are mostly immigrants like myself. Through such a station, we can easily reach and communicate with them.

I do live in a suburb of Los Angeles which is a very ethnically diverse community and a radio station is the best tool to reach the people here in their own language. Presently, stations here are being traded for approximately 20-40 million Dollars which makes it impossible for the average citizen or group to acquire one.

I personally do not believe that LPFM stations can cause interference to existing large stations, and if the interference problem is genuine and legitimate, than why many industrial countries do have such stations with no documented problems.

If the proposal to create a new Class is approved, I do like to see that:

- 1- Towns or cities are not limited to only one permit.
- 2- At least a 100 watt ERP is permitted to each LPFM station.
- 3- Antenna height of 30-60 meters be permitted.
- 4- Large corporations, media giants and currently existing station owners be prohibited from filing applications for LPFM stations.
- 5- Individuals and organizations equally be permitted to own LPFM stations.

6- LPFM station owners should not be forced to buy expensive equipment to start broadcasting, but all equipment either home built or readily purchased should meet or exceed FCC requirements and not necessarily be FCC type approved.

7- A specific location for the station should not be asked on the permit application because none of these LPFM stations do have a location yet and can not afford to lease or rent a space and wait for the FCC's approval of their application. Therefor only the town or the city should be asked on the application.

8- LPFM stations be permitted to broadcast in foreign languages.

9- LPFM stations not to be required to broadcast 24/day because most of them will be operated by volunteers.

10-LPFM stations be permitted to advertise to raise the necessary funds needed for operating expenses.

11-Only single antenna be permitted and no bays or stacking.

A handwritten signature in black ink, appearing to read 'Vartan Missirian', with a stylized flourish at the end.

Vartan Missirian  
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