

These comments are in response to some of the Comments that I have read regarding MM Docket No. 99-25. I have not read all of the filed comments, but I do notice some inconsistencies in the comments that I have read from those opposing the creation of the LPFM service.

First, with respect to the Reply Comments from KJZZ-FM and Sun Sounds Radio Reading Service, I believe that Mr. Matthusen has misinterpreted Dr. Chignoli's comments regarding "dropping subcarriers...to prevent interference" It is clear that, in context, Dr. Chignoli's comments refer to eliminating authorization for subcarriers BY LPFM SERVICES in order to reduce the possibility of them causing interference with existing broadcast stations. I certainly do not believe that anyone is proposing completely eliminating SCA subcarriers, as they provide many useful services. I also believe that Mr. Pasco's comments regarding peoples' lack of concern for the visually disabled community is misguided. Indeed, any service that is aimed at this community (such as reading services) should equally well be able to be enjoyed by the sighted community. If Mr. Pasco thinks that the only way to reach sight-impaired listeners is through SCA, he is overly limiting his audience. I could imagine LPFM stations coming into existence that cater to the visually disabled community, and nothing in the LPFM proposals would in any way restrict existing SCA subcarrier uses on current high-power stations.

Now on to the big boys.

The arguments against LPFM that I have seen are paraphrased below:

1. Because interference COULD occur, the whole proposal should be thrown out. No constructive comments as to how to make LPFM work, except by keeping the 2nd and 3rd adjacent rules unchanged, which would severely limit the number of LPFM stations that could exist.
2. It's unreasonable for people with cheap radios that might experience interference to have to buy new radios because of LPFM, but it's perfectly OK to require them to upgrade to digital at some time in the future.
3. Along similar lines, current receivers were built to the current rules regarding interference, so it's unreasonable for LPFM to change the rules (i.e. the current rules are good because they work in our favor). But the 60 dBu protection rule shouldn't apply because that rule might limit our coverage area and therefore advertising revenue (i.e. the current rules are bad because they work against us).
4. LPFM broadcasters might cheat by, say, hiding a linear amplifier in the attic to boost their power output. Therefore, LPFM should not be allowed. By this argument, automobiles should not be allowed because someone might disconnect the emissions controls.
5. Bonneville International Corp. states that the "perceived need for low power service is overstated." Yet almost all opposition comments focus on the potential for interference - this seems to me to be an implicit acknowledgement that there IS high demand for such service. Despite the opposition's attempts to portray LPFM supporters as scofflaw pirates, I believe that LPFM broadcasters will serve in the best interests of the FCC, their communities, and existing broadcast services. This means that nobody wants to cause interference or be interfered with, and so applicants will naturally choose the "best" available frequency from an interference standpoint. It seems to

me that interference only really becomes an issue if there are lots and lots of LPFM stations filling up the dial.

6. Bonneville rightly points out the significant use of translators in Utah, due to its mountainous terrain. There are still many areas that remain unserved. As I pointed out in my original comments posted 3/8/99, Sundance, where I reside, is one of them. It is not the translator freeze that is keeping the Salt Lake City stations from serving this community, it is the small population base. Existing stations will only install translators if they see profit in it (and this applies to non-commercial stations that depend on listener contributions for major support of their operation as well), so certain areas will never be served by the major stations. The same is true for television stations - I have waivers from all the Salt Lake City network affiliates to receive major network broadcasts on my satellite dish because it is just not cost effective for them to serve this area.

7. The only comment that I saw that addressed local public safety issues was Federal Signal's ERDS proposal (RM-9719). This is an interesting proposal, and does appear to have merit but note that it too will require an upgrade of receivers for automatic activation. In any case, it is not mutually exclusive with the LPFM proposal, and I do support Federal Signal's request that channel 200 not be allocated for use by LPFM stations.

A key point that I made in my original Comments that I would like to reiterate here is that existing stations cover large areas and thus cannot provide badly needed local coverage. The Internet does not solve this for several reasons:

1) The Internet is primarily a large-service area medium. I use it today to listen to radio stations KPIG in Freedom, CA and KFJC in Los Altos Hills, CA. It does provide some opportunity for "alternative voices" to have their say, but:

2) The Internet is still a rather exclusive club, with high cost of entry. There are some experiments in providing "free" Internet access, but for the average person it is unreasonable to consider using a home computer as a \$1000 (or more) radio. Also, as pointed out by the comments from Boron, CA, not everybody in this country even has reasonable, local access to the Internet yet.

3) It will be some time before the sound quality (for real-time programming) provided by the Internet is on a par with current broadcast services. To get there, everybody will need a high-speed access line, and that will take many years to achieve.

In conclusion, it is my opinion that the Commission must press forward and make LPFM a reality. I doubt that it will be the "nightmare" that its opponents make it out to be, and I also think that some of the proponents are in for a bit of "sticker shock" when they look at how much it will actually cost to get on the air when equipment and license fees (ASCAP, BMI) are all taken into consideration.