

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

In The Matter Of:)	
)	
Establishment of a Low Power Radio)	MM Docket 99-25
Service)	RM-9208
)	RM-9242
)	

**REPLY TO PETITION FOR RECONSIDERATION
FILED BY AMHERST ALLIANCE, ET AL**

1. REC Networks, is a group of people interested in the establishment of a low powered broadcast radio service. Arizona Microradio Association, which is a wholly owned entity of REC Networks whose mission statement is to establish a statewide or regional LPRS bandplan for Arizona and/or the Southwest (collectively, "REC"). REC is filing these comments in response to the Motion For Reconsideration filed by the Amherst Alliance, Alan Freed, William C. Doerner, Nickolaus E. Leggett, Maryjane M.J. Stelmach Honner and WKJCE Radio (collectively, "The Petitioners").
2. The Petitioners have filed a Motion For Reconsideration of the Order¹ issued by the Office of The Secretary on September 17, 1999; the already-extended reply comment deadline.

1-FCC Number 99-254. Order on motion made by Greater Media Corporation to extend the reply comment deadline of MM Docket 99-25 granted in part to extend the reply comment deadline to a date, which is "14 days after the date that a Notice of Proposed Rulemaking is issued for Digital Broadcasting".

3. Even though REC Networks and its associated projects and entities have filed timely reply comments, we agree with The Petitioner's allegations that LPFM "movement"² was not properly notified or advised of the Order until after 3PM local time (Washington, DC) on the day of the comment deadline. REC was not made aware of the extension of the deadline until after 7PM local time (Washington, DC).

4. We do not see the value of delaying the LPFM proceeding in order to establish rulemaking for digital FM radio. The LPFM service proposed in MM Docket 99-25, uses technology, which is already established while the digital radio proposals are still in the experimental stages. The LPFM proceeding has already been through the legal hurdles of the rulemaking process and to delay the proceeding for an experimental and unestablished technology to catch up would not be in the public interest. LPFM is ready for a rulemaking and digital radio has not even had a NPRM or NOI issued.

5. We feel that there has been plenty of time for all parties interested in the LPFM proceeding to review all comments, especially as the comments are freely available on the Internet.

2-REC considers the "LPFM Movement" as those who are key players in the LPFM proposal on a nationwide scope. These include (but are not limited to) Nikolaus Leggett - the author of RM-9208, Rodger Skinner - the author of RM-9242, The Center for Democratic Communications-Media Access Project, The Amherst Alliance, REC Networks and the Microradio Empowerment Coalition.

6. We feel that changing the Reply Comment deadline to Friday, October 1 would be very reasonable as this will give time for remaining entities who have not filed reply comments to submit them in a timely fashion.

7. In conclusion, based on the arguments made by The Petitioners in their motion, REC urges The Commission to GRANT the Motion For Reconsideration made by The Petitioners and change the Reply Comment deadline to October 1, 1999.

Respectfully Submitted,

Richard-Michelle Eyre
REC Networks
REC Networks-California
REC-FM
REC LPFM Project
REC SuperCoordinator Project
Arizona Microradio Association
P O Box 2408
Tempe, AZ 85280-2408
rec@recnet.com
<http://www.recnet.com>

September 26, 1999