

MME

MM 99-25

essere delle mie osservazioni

Mr. Klein I hold you responsible if the DOJ Files no Charges, i hold you Accountable for all and any event or actions cause by your disregard of my Constitutional Rights (Theft of my Airways)

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[REDACTED]

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Read Sherman Anti-Trust Act, Monopolization of Mrs. D'Alessandro's Airways! I and Mrs. Olga D'Alessandro have a Right to our Airspace and free Enterprise and Teach about a Music Heritage. The FCC has not done it's job in preserving, and protecting, Mrs. D'Alessandro's Air Space. Let the people who have Committed a Felony, Concede my airspace back.

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OCT 04 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

DOJ
US The Department Of Justice Anti-Trust Division
JOEL I. KLEIN
950 Pennsylvania Avenue, NW
Washington, DC 20530-000

Please File (Felony a Major Crime) Charges Against Ed Frits and The NAB, for

Theft and Monopolization of Mrs. Olga D'Alessandro Airways.

THIS IS a petition to Congress, and the FCC for the redress of a constitutional wrong

!!!! The Congress, and NAB have no Constitutional Law to stop LPFM FCC Docket MM 99-25: as They Claim, Loss of Revenue and or cause Interference. Regress all NAB Stations, to 10 to 3000 Watts.

Ed Frits and the NAB are Not Racist, Not Discriminatory, and Writes and Speaks in Support of Community Radio, how can they be Against FCC Docket MM 99-25 Which is True Community Radio Service, Do you think the NAB is HYPOCRITES, DICTATORSHIP, BELLIGERENT, AND RACIST I Leave you to Monitor their Actions in regard to FCC Docket MM 99-25 then you DECIDE.

We the People of the United States and Mrs. Olga D'Alessandro, in Order to form a more perfect Union, establish Justice, insure domestic Tranquility, provide for the common defence, promote the general Welfare, and secure the

Blessings of Liberty to ourselves and our Posterity, do ordain and establish this Constitution for the United States of America.

If Congress chooses to ignore it, then it may be brought as a case in federal

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court by Mrs. Olga D'Alessandro and the citizens of the Republic Of The United States.

Mr. Klein File Charges with Federal Court, Mrs. D'Alessandro's and The American Publics Constitutional Rights are being FELONIZED! By The NAB and Congress!

Being in Congress does not protect them.

Mrs. D'Alessandro Sue CONGRESS: Date 9/14/99

Tauzin, McCain, Conrad Burns, and Others From Congress:

The Congress and NAB have no Constitutional Law to stop LPFM FCC Docket MM 99-25: as They Claim, Loss of Revenue and or cause Interference.

To: Mr. Klein DOJ:

US The Department Of Justice Anti-Trust Division

JOEL I. KLEIN

950 Pennsylvania Avenue, NW

Washington, DC 20530-0001

To: Presidente Kennard Del FCC:

To: Fritte di Ed ed Il NAB:

To: Congresso Onorato:

The Legal Precedents for Enforcing Our Rights

Stampato

Mister Joseph D'Alessandro

THIS IS a petition to Congress for the redress of a constitutional wrong, and attempt by, Ed Frits and the NAB, With the Un-Ethical Help Of Billy Tauzin, Conrad Burns, John McCain and Others in Congress, to Stop the FCC from making into Law FCC Docket MM 99-25 LPFM Community Radio Service If Congress chooses to ignore it, then it may be brought as a case in federal court by Mrs. Olga D'Alessandro and the citizens of the Republic Of The United States.

The petition concerns the limits of federal power. It raises the question of whether Congress can disenfranchise an American community LPFM Community

Radio, impose on its citizens a government that is not republican in character and then subject them to a series of financial liabilities and disabilities that progressively erode the value of their real property, and Community Radio. And Free Enterprise.

It is time to discard the assumption that anything Congress does to Mrs. D'Alessandro and the American Citizens LPFM Radio is by definition constitutional. The acceptance of this idea reflects the demoralization of the local populace but not a serious examination of constitutional doctrine.

In fact, the Bill of Rights applies with undiluted force to American citizens living in the the United States. They enjoy the right to religious freedom and free speech, and their Radio Airspace, to a jury trial and so on.

As the Supreme Court found in 1888, "nothing in the history of the constitution" supports depriving Mrs. D'Alessandro and the American Citizens of "any of the constitutional guarantees of life, liberty and property.", and Free Enterprise, The FCC Must Regress all NAB, NPR, and CPR Radio Stations back to 10 to 3000 Watts to serve their Community of License, not Several States.

The judicial role in American democracy has been most essential when the political branches were unable or unwilling to respond to the plight of a political minority LPFM Broadcasters (LPFM Radio) seeking equality under law FCC Docket MM 99-25.

In every historic modern challenge to disenfranchisement schemes – poll taxes, white primaries, malapportioned districts – the defenders of exclusion have argued that the court has no role to play. But they have lost every time. Again, if Congress turns away from its duty, the court will have an essential role in "[making] sure the channels of political participation and communication are kept open," in the words of Prof. John Hart Ely. American government rests on the "consent of the governed," the Declaration of Independence tells us, and the principle that "all men are created equal." Congress should not run away from this historic task, but the Supreme Court may not do so.

Date: 9/20/99



*From: Mr. Joseph D'Alessandro
94 Angola Estates
Lewes, Delaware 19958
302-945-1554*

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AUG 23 48 PM '99

It has come to my attention that the FCC is in the midst of considering creating some form of community radio. I have always thought this was necessary, to provide equal opportunity for various voices within each the finances which would enable them to publicize through the corporate media. Not only are local musicians unrepresented in not having an outlet to reach the masses, but community organizations are unrepresented as well. Other reasons for establishing low power FM radio are; to broaden the arena of political, social and entertainment programming, provide low cost advertising opportunities for local small businesses, and to create new broadcast ownership opportunities. Because radio is one of the most effective and dominant means of communication today, creating low power FM radio will only strengthen and unite our communities. I hope you will see the benefits of its establishment.

Sincerely,
 Harmony Conger

Harmony Conger

MM 99-25

Before The
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.

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In the Matter of
Creation of a Low Power
Radio Service

DOCKET FILE COPY ORIGINAL

OCT 04 1999

MM Docket No. 99-25

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RM-9208

RM-9242

To: The Commission

REPLY COMMENTS

NAME OF ENTITY FILING REPLY COMMENTS hereby submits comments in response to the Commission's Notice of Proposed Rulemaking in the above-captioned matter. See *In the Matter of Creation of a Low Power Radio Service*, Notice of Proposed Rulemaking (hereinafter "*Low Power Radio NPRM*"), MM Docket No. 99-25, RM-9208, RM-9242 (released February 3, 1999).

Statement of Interest

(Party should express why it is interested in this rulemaking).

Argument

(Party should state that it supports particular/entire portions of the comments of the New York State Thruway Authority; if entirely, should indicate that they incorporate arguments by reference). Should express an intent to file for such facilities if made available.

Respectfully submitted,

NAME OF ENTITY FILING REPLY COMMENTS

Dated: September __, 1999

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Before The
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.

In the Matter of

Creation of a Low Power
Radio Service

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MM Docket No. 99-25
RM-9208
RM-9242

To: The Commission

COMMENTS OF THE NEW YORK STATE THRUWAY AUTHORITY

Stephen Diaz Gavin
Jeffrey L. Ross

Patton Boggs LLP
2550 M Street, N.W.
Washington, D.C. 20037-1350
202-457-6000

Its Attorneys

August 2, 1999

Before The
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.

In the Matter of)	
)	
Creation of a Low Power)	MM Docket No. 99-25
Radio Service)	
)	RM-9208
)	RM-9242
)	

To: The Commission

COMMENTS OF THE NEW YORK STATE THRUWAY AUTHORITY

The New York State Thruway Authority ("NYSTA" or the "Authority") hereby submits its comments in the above captioned proceeding in response to the Commission's *Notice of Proposed Rulemaking* outlining the establishment of a low power FM radio service.¹ As set forth below, NYSTA supports the creation of low power FM service for noncommercial entities, particularly public service entities that are fulfilling critical public safety functions.

INTRODUCTION AND STATEMENT OF INTEREST

NYSTA is a not-for-profit public corporation that operates and maintains the Governor Thomas E. Dewey Thruway (the "Thruway"). The Thruway is a 641-mile superhighway crossing New York State. It is the longest toll superhighway system in the United States. The Thruway

¹ See *In the Matter of Creation of a Low Power Radio Service*, Notice of Proposed Rulemaking (hereinafter "*Low Power Radio NPRM*"), MM Docket No. 99-25, RM-9208, RM-9242 (released February 3, 1999).

stretches from the New York City metro area to Buffalo; a majority of the State's 62 cities (including the nine largest) are located within the Thruway corridor, which contains more than 80 percent of the State's population and registered motor vehicles. About 230 million vehicles travel more than 9 billion miles on the Thruway each year. On average, traffic increases on the Thruway system by 2% to 4% each year.

As part of its operations NYSTA utilizes numerous Traveler's Information Service ("TIS") stations. These TIS stations are low-power AM stations authorized under Part 90 of the Commission's Rules to broadcast public safety and travel advisory information to the motoring public. NYSTA experiences interference throughout its TIS system. During the daytime hours, the interference is particularly strong in the New York City Metro area where atmospheric conditions and received interference from commercial AM radio stations and other TIS facilities significantly reduce, or in some instances eliminate, the operational effectiveness of NYSTA's TIS system. During the nighttime hours, co-channel interference from overpowered AM broadcast stations produce so much interference that at times they knock the Authority's TIS stations off the air; in the Syracuse area the problem is caused by an overpowered Canadian radio station, and in the New York City metro area an overpowered Caribbean station is the source of interference.

NYSTA has implemented various engineering design changes in an effort to minimize interference and increase system capacity on the existing, AM-based TIS service. Ultimately, however, these changes can only moderate, not eliminate, the problem in providing continuous and reliable safety information to highway users. The possibility of migrating to the FM band via a low power FM service such as the one proposed in the NPRM could provide a more permanent solution to the TIS reception problems and greatly facilitate NYSTA's mission of furthering public safety.

As outlined in Exhibit A attached to these Comments, if the Commission adopts rules in

this proceeding that allow operation of low power FM stations, NYSTA would like to construct LP100 stations which would broadcast TIS programming through a highly directionalized signal along the Thruway right-of-way. While directionalizing AM frequencies requires very large, complicated antenna systems occupying large land areas, the same can be accomplished with FM services in a much simpler, more cost-effective manner. The result is that NYSTA could broadcast its public safety and travel advisory messages along the roadway itself, thereby servicing the traveling public, while at the same time diminishing any potential interference low power radio might cause to, as well as receive from, full power co-channel commercial stations.

COMMENTS IN RESPONSE TO ISSUES RAISED IN NPRM

I. The Commission Should Limit Eligibility in Any Low Power FM Service to Non-Commercial Entities.

In the NPRM, the Commission seeks comment on whether it should limit all low power and microradio services to noncommercial operations and whether eligibility should be restricted to noncommercial licensees under the Commission's current rules.² NYSTA strongly believes that the Commission should limit eligibility of this service to noncommercial entities because they provide vital public services not currently performed by commercial licensees. However, in this context "noncommercial" should not be restricted to noncommercial educational organizations as is currently the case. 47 U.S.C. § 397(6). Rather, in the arena of low power FM authorizations, the Commission should define the term "noncommercial entities" as including any "exempt" organization under Section 501 of the Internal Revenue Code,³ as well as any state or local

² NPRM at ¶ 19.

³ 18 U.S.C. § 501(c).

government entity, subdivision, authority, department or corporation. For purposes of any non-government entity, the eligibility should be restricted to nonprofit entities. See 47 U.S.C. § 397(8).⁴

There are many public safety and transportation entities like NYSTA throughout the nation distributing traveler safety information that could benefit from the creation of low power FM services. For numerous transportation entities, broadcast radio is the only way to convey messages on a real time basis. Necessary communications include the announcement of not only unforeseen incidents and accidents, but also planned activities, such as construction schedules, and the suggestion of alternate routes. The role of TIS services in public safety cannot be overstated because not only are they the primary conduit for the transmission of traffic information, but they can also serve as a vital link in the chain of communication systems that will be pressed into service in the event of a local or national emergency. Low power FM could ensure that these critical messages reach motorists as expeditiously as possible, thereby improving safety and efficiency on the nation's roads.

Low power and microradio services could assist local governments in communicating with their citizenry about a host of topics ranging from safety messages to public service announcements to information regarding the delivery of local services. Furthermore, low power and microradio can

⁴ "The term 'nonprofit' (as applied to any foundation, corporation or association) means a foundation, corporation, or association, no part of the net earnings of which inures, or may lawfully inure, to the benefit of any private shareholder or individual."

There is ample precedent for the reservation of a part of the broadcast spectrum for designated uses. Just as the Commission has reserved a portion of the FM band from 88.1 MHz to 91.9 MHz exclusively for noncommercial educational use, 47 C.F.R. §§ 73.501, 73.503, the Commission could reserve a portion of the low power band for public safety entities.

The Commission has also reserved spectrum space for police and public safety communications by deleting certain channels from the broadcast spectrum. Congress has specifically directed the reservation of broadcast spectrum for public safety uses. Following Congress' directive in the Balanced Budget Act of 1997,⁵ the Commission reallocated 24 MHz from the UHF band to fixed and mobile use for police and public safety communications. See, Report and Order in ET Docket No. 97-157, FCC 97-421, released January 6, 1998.

Alternatively, the Commission could reserve a number of stations in each media market for PSEs. This proposal would guarantee opportunities to deliver public safety information in all markets in the same manner that the Commission has guaranteed an opportunity to deliver noncommercial educational programming in all markets by reserving at least one TV allocation per market for such noncommercial, educational use. Sixth Report and Order on TV Allocations, 41 FCC 148 (1952).

In the alternative, if the Commission determines that it's not going to reserve a portion of the low power FM and microradio spectrum or licenses for public safety entities, then NYSTA suggests that the Commission grant preferences to PSE applications in the event mutually exclusive applications are filed for the same license. The public interest would not be served by requiring public service entities to compete with commercial interests for spectrum space. By granting the qualified PSE with a demonstrated need for the license a preference, the Commission would

provide citizens with useful information similar to communities' use of Public, Education and Government ("PEG") cable television channels. However, unlike PEG channels, low power and microradio stations will reach the millions of Americans who do not have access to or cannot afford cable television services, but have radios in their homes.

Low power and microradio would also benefit greatly universities, colleges, and high schools throughout the Nation. Currently, more than 140 colleges and universities operate carrier current, cable or day-time only radio stations, in part because of lack of available FM spectrum and the associated costs of broadcasting a full-power signal under current regulations. Low power FM and microradio will allow educational-based stations to expand their reach to students living off-campus, neighboring families, alumni and other interested neighbors, and will provide students with an opportunity to experience broadcasting to the local community.

II. The Commission Should Reserve a Portion of the Available Low Power and Microradio Licenses for Public Safety Entities or Provide Them with a Preference in Resolving Mutually Exclusive Applications.

As discussed in section I supra, there are a variety of noncommercial entities that could benefit from the establishment of low power FM or microradio services. However, public entities performing public safety functions ("public safety entities" or "PSEs") serve a critical role unsurpassed in importance in the nation's communities. For this reason, even if the Commission determines that eligibility for low power authorizations should be limited to noncommercial applicants, NYSTA believes that the Commission should reserve a portion of the low power FM and microradio licenses for PSEs. The need for such a reservation is even greater if the Commission decides not to limit this service to noncommercial entities.

recognize the important role these entities play in enhancing the lives of citizens in communities throughout the nation.

III. The Commission Should Adopt Ownership Rules That Will Enable Public Entities to Obtain the Licenses They Need To Perform Public Safety Functions.

NYSTA strongly urges the Commission not to adopt its proposed rule on local ownership for low power and microradio FM services because such an adoption would effectively limit such licensees to a single station in each market.⁶ When Congress enacted the Telecom Act of 1996, which eliminated numerous broadcast ownership restrictions, Congress articulated its intent that there should no longer be any “one to the market” policies in radio broadcasting.

Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56 § 202, 47 C.F.R. § 73.3555 (adopting new ownership rules from Telecom Act). The Commission’s proposed rule in the NPRM is tantamount to a “one to the market” policy for low power and microradio FM services, which Congress has directed be abandoned in the full power service. Further, such a rule would cripple the ability of public service entities like the Thruway Authority to as set string together, forth in Exhibit A, multiple directionalized stations along a geographic corridor to provide necessary safety services to the motoring public. The NYSTA plan requires that the Thruway operate more than one station in individual markets. In the alternative, if the Commission decides to impose some form of one to the market restriction, the Commission should carve out an exception for PSEs providing a public safety function that may require additional licenses.

⁵ Section 3004 of the Balanced Budget Act of 1997, Pub. L. No. 105-33, 111 Stat. 251 §3004.

⁶ *Id.*

NYSTA similarly urges the Commission not to adopt its proposed national restriction of five or ten stations for low power FM ownership particularly if, as NYSTA has proposed, the Commission limits the availability of this service to qualified noncommercial entities.⁷ Such a restriction would effectively prohibit NYSTA from using low power FM for its TIS system because NYSTA will need in excess of five or ten stations total in the markets it serves. Further, such a restriction is not consistent with the Telecommunications Act, wherein Congress eliminated national ownership restrictions altogether. *Id.* In a noncommercial context, there are no “antitrust” or market share considerations. Indeed, in a noncommercial context, there would be no economic incentive for a licensee to acquire too many stations because of their inability to be supported through sale of advertising. In the alternative, if the Commission decides to adopt national ownership rules, NYSTA asks that qualified PSEs be exempt from such a rule.

NYSTA submits that the Commission should not employ competitive bidding or auctions if the pool of eligible applicants is restricted to noncommercial entities. The provision of the Communications Act authorizing the use of auctions to select from among competing broadcast applicants specifically excludes noncommercial educational applicants. 47 U.S.C. § 309(j)(1). But the underlying purpose of this exclusion applies to other noncommercial entities as well. By definition, noncommercial applicants will be operating the low power FM stations on a not for profit basis. Unlike commercial operators, noncommercial broadcasters cannot recover the transaction costs of acquiring low power FM licenses through the sale of commercial advertising or for profit operations. Noncommercial licensees do not profit from use of the nation’s airways.

⁷ *Low Power Radio NPRM* at ¶ 60.

Further, the Commission's use of competitive bidding must be consistent with the Commission's obligations in the public interest to continue to use engineering solutions, negotiation, threshold qualifications, service regulations and other means in order to avoid mutual exclusivity in application and licensing proceedings. 47 U.S.C. § 309(j)(6)(E). Low power FM authorizations should be licensed either upon a first-come, first served basis, or on the basis of filing windows of very short duration, with a mandatory period following the cut-off date for applicants to resolve mutual exclusivity by either settlement, frequency coordination or engineering solutions.

NYSTA agrees with the Commission that there should be no local residency requirement. Such a mandate would frustrate the ability of qualified PSEs to provide services. Further, there does not appear to be any demonstrated nexus between local ownership and public service.

NYSTA supports the Commission's proposal to prohibit any entity with an attributable interest in a full power station from having any ownership interest in a low power or microradio station in any market.⁸ Noncommercial entities should have the opportunity to broadcast to citizens without having to compete with well-funded commercial operators.

IV. The Commission Should Adopt Technical Standards That Will Permit Public Entities to Use Low Power and Microradio Services to Fulfill Public Safety Functions.

As set forth in Exhibit A, NYSTA wishes to use the proposed 100-watt secondary service ("LP 100") to provide TIS on the FM band to motorists travelling on the Thruway. The antennas providing TIS would be directionalized to focus their coverage along the Thruway's right-of-way, thereby minimizing the stations' coverage contours and potential for interference. As such, the

⁸ *Low Power Radio NPRM* at ¶ 57.

Thruway Authority's plan for use of LP 100 stations could fulfill the statutory directive in the Communications Act to make the most efficient use of the frequency. 47 U.S.C. § 307(b).

In the NPRM, the Commission seeks input on the appropriate levels of power and antenna height for this service.⁹ The attached Exhibit A outlines how low power FM service would operate as proposed by the Thruway along a section of Interstate 87 between the Spring Valley toll barrier and the Nyack Maintenance facility. In addition, the attached Exhibit A demonstrates how such service as proposed to be operated by NYSTA can comply with the Commission's desire to minimize interference to second and third adjacent channels.

In the model set forth in Exhibit A, which was prepared by NYSTA's technical staff, the basic low power TIS station consists of a low power FM transmitter (5-10 watts output) feeding a moderate gain axial mode helical beam antenna to achieve an effective radiated power (ERP) on the order of 100 watts. The antenna would be mounted at approximately 10 meters HAAT. NYSTA would propose to use monaural broadcast to achieve both better multipath fading and, as sought by the NPRM, impose a tighter emission mask to minimize interference potential on second and third adjacent channels.

It is the intention of NYSTA to operate contiguous groups of stations in simulcast, using a common reference for carrier frequency synchronization and single source program audio origination. Such clusters would be identified with one call sign and would constitute one "station". It is absolutely imperative that the rules for this service permit such operation. Simulcast enables efficient delivery of vital traffic information in a regional corridor without confusing frequency changes, complicated signage, or interference between adjacent segments.

⁹ *Low Power Radio NPRM* at ¶ 30

The attached model demonstrates the following:

1. Although the model is for one module, two antennas, mounted back to back, or offset by an appropriate angle to compensate for road alignment, can cover twice the length of road proposed by a single module.
2. Single models can be "stacked," nose to tail, down the length of a roadway corridor, such as the path of the Thruway in the New York metro area corridor. Transmitter frequency can be locked with parallel delivery of audio as is now used in the AM-band TIS system for a simulcast "ribbon" system.

The flexibility of the design outlined in the attached Exhibit A permits application of low power FM to TIS uses while minimizing interference to co-channel and adjacent channel users and maximize the availability of spectrum to other users.

V. Conclusion

Low power FM service will greatly benefit the public. By restricting the eligibility to noncommercial entities, the Commission can ensure that the service provides needed information to the public without threatening the integrity of the commercial aural broadcast service. Even if the Commission does not decide to limit the service to noncommercial and public service entities, the Commission should consider reserving a portion of the low power FM service to noncommercial, public service entities, for which there is precedent in past Commission policies reserving portions of the broadcast spectrum. Finally, the Commission should not impose undue restrictions that would limit the ability of public service entities to offer the benefits of low power FM service in a larger geographic area than one community.

Respectfully submitted,

NEW YORK STATE THRUWAY AUTHORITY

Stephen Diaz Gavin
Jeffrey L. Ross

Patton Boggs LLP
2550 M Street, N.W.
Washington, D.C. 20037-1350
202-457-6000

Its Attorneys

Before The **FEDERAL COMMUNICATIONS COMMISSION**
WASHINGTON, D.C.

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In the Matter of)
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Creation of a Low Power)
Radio Service)
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MM Docket No. 99-25
RM-9208
RM-9242

To: The Commission

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REPLY COMMENTS

THE MICHIGAN DEPARTMENT OF TRANSPORTATION hereby submits
Comments in response to the Commission's Notice of Proposed Rulemaking in the above
-captioned matter. See: *In the Matter of Creation of a Low Power Radio Service*, Notice
of Proposed Rulemaking (hereinafter "*Low power Radio NPRM*"), MM Docket No. 99-
25, RM-9208, RM-9242 (released February 3, 1999).

Statement of Interest

The Michigan Department of Transportation ("MDOT") is a department of the
State government which operates and maintains state trunkline highways and Interstate
Freeways and expressways throughout the State's eighty-three (83) counties. In the eight
County area of Southeastern Michigan, including metropolitan Detroit, MDOT operates
an Advanced Traffic Management System ("ATMS") and an Advanced Traveler
Information System ("ATIS") which covers 180 statute miles of Interstate freeways
and State trunkline highways. MDOT has, *inter alia*, twelve (12) Highway Advisory

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Radio ("HAR") stations within the ATMS/ATIS tuned to 1630KHz AM which are designed to provide the public with real time emergency information concerning incidents, accidents, hazardous material spills, construction, and other congestion generating events. MDOT's experience with the AM HARs is identical to that of the New York State Thruway Authority. Consequently, MDOT urges the Commission to create a low power FM radio service.

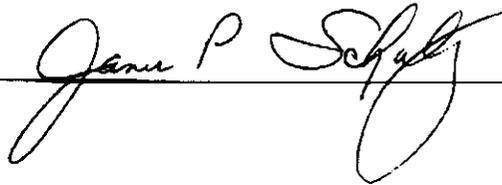
Argument

MDOT supports in their entirety, and hereby incorporates by reference herein, each of the comments made by the New York State Thruway Authority in their August 2, 1999 Response. Finally, MDOT expresses an intent to file for such facilities if made available.

Respectfully submitted,

MICHIGAN DEPARTMENT OF TRANSPORTATION

By: _____

A handwritten signature in cursive script, appearing to read "Jane P. Schatz", is written over a horizontal line.

Dated: September 17, 1999

Before The
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.

In the Matter of
Creation of a Low Power
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MM Docket No. 99-25

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To: The Commission

COMMENTS OF THE NEW YORK STATE THRUWAY AUTHORITY

Stephen Diaz Gavin
Jeffrey L. Ross

Patton Boggs LLP
2550 M Street, N.W.
Washington, D.C. 20037-1350
202-457-6000

Its Attorneys

August 2, 1999

Before The
FEDERAL COMMUNICATIONS COMMISSION
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To: The Commission

COMMENTS OF THE NEW YORK STATE THRUWAY AUTHORITY

The New York State Thruway Authority ("NYSTA" or the "Authority") hereby submits its comments in the above captioned proceeding in response to the Commission's *Notice of Proposed Rulemaking* outlining the establishment of a low power FM radio service.¹ As set forth below, NYSTA supports the creation of low power FM service for noncommercial entities, particularly public service entities that are fulfilling critical public safety functions.

INTRODUCTION AND STATEMENT OF INTEREST

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¹ See *In the Matter of Creation of a Low Power Radio Service*, Notice of Proposed Rulemaking (hereinafter "*Low Power Radio NPRM*"), MM Docket No. 99-25, RM-9208, RM-9242 (released February 3, 1999).

stretches from the New York City metro area to Buffalo; a majority of the State's 62 cities (including the nine largest) are located within the Thruway corridor, which contains more than 80 percent of the State's population and registered motor vehicles. About 230 million vehicles travel more than 9 billion miles on the Thruway each year. On average, traffic increases on the Thruway system by 2% to 4% each year.

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As outlined in Exhibit A attached to these Comments, if the Commission adopts rules in

this proceeding that allow operation of low power FM stations, NYSTA would like to construct LP100 stations which would broadcast TIS programming through a highly directionalized signal along the Thruway right-of-way. While directionalizing AM frequencies requires very large, complicated antenna systems occupying large land areas, the same can be accomplished with FM services in a much simpler, more cost-effective manner. The result is that NYSTA could broadcast its public safety and travel advisory messages along the roadway itself, thereby servicing the traveling public, while at the same time diminishing any potential interference low power radio might cause to, as well as receive from, full power co-channel commercial stations.

COMMENTS IN RESPONSE TO ISSUES RAISED IN NPRM

I. The Commission Should Limit Eligibility in Any Low Power FM Service to Non-Commercial Entities.

In the NPRM, the Commission seeks comment on whether it should limit all low power and microradio services to noncommercial operations and whether eligibility should be restricted to noncommercial licensees under the Commission's current rules.² NYSTA strongly believes that the Commission should limit eligibility of this service to noncommercial entities because they provide vital public services not currently performed by commercial licensees. However, in this context "noncommercial" should not be restricted to noncommercial educational organizations as is currently the case. 47 U.S.C. § 397(6). Rather, in the arena of low power FM authorizations, the Commission should define the term "noncommercial entities" as including any "exempt" organization under Section 501 of the Internal Revenue Code,³ as well as any state or local

² NPRM at ¶ 19.

³ 18 U.S.C. § 501(c).

government entity, subdivision, authority, department or corporation. For purposes of any non-government entity, the eligibility should be restricted to nonprofit entities. See 47 U.S.C. § 397(8).⁴

There are many public safety and transportation entities like NYSTA throughout the nation distributing traveler safety information that could benefit from the creation of low power FM services. For numerous transportation entities, broadcast radio is the only way to convey messages on a real time basis. Necessary communications include the announcement of not only unforeseen incidents and accidents, but also planned activities, such as construction schedules, and the suggestion of alternate routes. The role of TIS services in public safety cannot be overstated because not only are they the primary conduit for the transmission of traffic information, but they can also serve as a vital link in the chain of communication systems that will be pressed into service in the event of a local or national emergency. Low power FM could ensure that these critical messages reach motorists as expeditiously as possible, thereby improving safety and efficiency on the nation's roads.

Low power and microradio services could assist local governments in communicating with their citizenry about a host of topics ranging from safety messages to public service announcements to information regarding the delivery of local services. Furthermore, low power and microradio can

⁴ "The term 'nonprofit' (as applied to any foundation, corporation or association) means a foundation, corporation, or association, no part of the net earnings of which inures, or may lawfully inure, to the benefit of any private shareholder or individual."

There is ample precedent for the reservation of a part of the broadcast spectrum for designated uses. Just as the Commission has reserved a portion of the FM band from 88.1 MHz to 91.9 MHz exclusively for noncommercial educational use, 47 C.F.R. §§ 73.501, 73.503, the Commission could reserve a portion of the low power band for public safety entities.

The Commission has also reserved spectrum space for police and public safety communications by deleting certain channels from the broadcast spectrum. Congress has specifically directed the reservation of broadcast spectrum for public safety uses. Following Congress' directive in the Balanced Budget Act of 1997,⁵ the Commission reallocated 24 MHz from the UHF band to fixed and mobile use for police and public safety communications. See, Report and Order in ET Docket No. 97-157, FCC 97-421, released January 6, 1998.

Alternatively, the Commission could reserve a number of stations in each media market for PSEs. This proposal would guarantee opportunities to deliver public safety information in all markets in the same manner that the Commission has guaranteed an opportunity to deliver noncommercial educational programming in all markets by reserving at least one TV allocation per market for such noncommercial, educational use. Sixth Report and Order on TV Allocations, 41 FCC 148 (1952).

In the alternative, if the Commission determines that it's not going to reserve a portion of the low power FM and microradio spectrum or licenses for public safety entities, then NYSTA suggests that the Commission grant preferences to PSE applications in the event mutually exclusive applications are filed for the same license. The public interest would not be served by requiring public service entities to compete with commercial interests for spectrum space. By granting the qualified PSE with a demonstrated need for the license a preference, the Commission would

provide citizens with useful information similar to communities' use of Public, Education and Government ("PEG") cable television channels. However, unlike PEG channels, low power and microradio stations will reach the millions of Americans who do not have access to or cannot afford cable television services, but have radios in their homes.

Low power and microradio would also benefit greatly universities, colleges, and high schools throughout the Nation. Currently, more than 140 colleges and universities operate carrier current, cable or day-time only radio stations, in part because of lack of available FM spectrum and the associated costs of broadcasting a full-power signal under current regulations. Low power FM and microradio will allow educational-based stations to expand their reach to students living off-campus, neighboring families, alumni and other interested neighbors, and will provide students with an opportunity to experience broadcasting to the local community.

II. The Commission Should Reserve a Portion of the Available Low Power and Microradio Licenses for Public Safety Entities or Provide Them with a Preference in Resolving Mutually Exclusive Applications.

As discussed in section I supra, there are a variety of noncommercial entities that could benefit from the establishment of low power FM or microradio services. However, public entities performing public safety functions ("public safety entities" or "PSEs") serve a critical role unsurpassed in importance in the nation's communities. For this reason, even if the Commission determines that eligibility for low power authorizations should be limited to noncommercial applicants, NYSTA believes that the Commission should reserve a portion of the low power FM and microradio licenses for PSEs. The need for such a reservation is even greater if the Commission decides not to limit this service to noncommercial entities.

recognize the important role these entities play in enhancing the lives of citizens in communities throughout the nation.

III. The Commission Should Adopt Ownership Rules That Will Enable Public Entities to Obtain the Licenses They Need To Perform Public Safety Functions.

NYSTA strongly urges the Commission not to adopt its proposed rule on local ownership for low power and microradio FM services because such an adoption would effectively limit such licensees to a single station in each market.⁶ When Congress enacted the Telecom Act of 1996, which eliminated numerous broadcast ownership restrictions, Congress articulated its intent that there should no longer be any "one to the market" policies in radio broadcasting.

Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56 § 202, 47 C.F.R. § 73.3555 (adopting new ownership rules from Telecom Act). The Commission's proposed rule in the NPRM is tantamount to a "one to the market" policy for low power and microradio FM services, which Congress has directed be abandoned in the full power service. Further, such a rule would cripple the ability of public service entities like the Thruway Authority to as set string together, forth in Exhibit A, multiple directionalized stations along a geographic corridor to provide necessary safety services to the motoring public. The NYSTA plan requires that the Thruway operate more than one station in individual markets. In the alternative, if the Commission decides to impose some form of one to the market restriction, the Commission should carve out an exception for PSEs providing a public safety function that may require additional licenses.

⁵ Section 3004 of the Balanced Budget Act of 1997, Pub. L. No. 105-33, 111 Stat. 251 §3004.

⁶ *Id.*

NYSTA similarly urges the Commission not to adopt its proposed national restriction of five or ten stations for low power FM ownership particularly if, as NYSTA has proposed, the Commission limits the availability of this service to qualified noncommercial entities.⁷ Such a restriction would effectively prohibit NYSTA from using low power FM for its TIS system because NYSTA will need in excess of five or ten stations total in the markets it serves. Further, such a restriction is not consistent with the Telecommunications Act, wherein Congress eliminated national ownership restrictions altogether. *Id.* In a noncommercial context, there are no "antitrust" or market share considerations. Indeed, in a noncommercial context, there would be no economic incentive for a licensee to acquire too many stations because of their inability to be supported through sale of advertising. In the alternative, if the Commission decides to adopt national ownership rules, NYSTA asks that qualified PSEs be exempt from such a rule.

NYSTA submits that the Commission should not employ competitive bidding or auctions if the pool of eligible applicants is restricted to noncommercial entities. The provision of the Communications Act authorizing the use of auctions to select from among competing broadcast applicants specifically excludes noncommercial educational applicants. 47 U.S.C. § 309(j)(1). But the underlying purpose of this exclusion applies to other noncommercial entities as well. By definition, noncommercial applicants will be operating the low power FM stations on a not for profit basis. Unlike commercial operators, noncommercial broadcasters cannot recover the transaction costs of acquiring low power FM licenses through the sale of commercial advertising or for profit operations. Noncommercial licensees do not profit from use of the nation's airways.

⁷ *Low Power Radio NPRM* at ¶ 60.

Further, the Commission's use of competitive bidding must be consistent with the Commission's obligations in the public interest to continue to use engineering solutions, negotiation, threshold qualifications, service regulations and other means in order to avoid mutual exclusivity in application and licensing proceedings. 47 U.S.C. § 309(j)(6)(E). Low power FM authorizations should be licensed either upon a first-come, first served basis, or on the basis of filing windows of very short duration, with a mandatory period following the cut-off date for applicants to resolve mutual exclusivity by either settlement, frequency coordination or engineering solutions.

NYSTA agrees with the Commission that there should be no local residency requirement. Such a mandate would frustrate the ability of qualified PSEs to provide services. Further, there does not appear to be any demonstrated nexus between local ownership and public service.

NYSTA supports the Commission's proposal to prohibit any entity with an attributable interest in a full power station from having any ownership interest in a low power or microradio station in any market.⁸ Noncommercial entities should have the opportunity to broadcast to citizens without having to compete with well-funded commercial operators.

IV. The Commission Should Adopt Technical Standards That Will Permit Public Entities to Use Low Power and Microradio Services to Fulfill Public Safety Functions.

As set forth in Exhibit A, NYSTA wishes to use the proposed 100-watt secondary service ("LP 100") to provide TIS on the FM band to motorists travelling on the Thruway. The antennas providing TIS would be directionalized to focus their coverage along the Thruway's right-of-way, thereby minimizing the stations' coverage contours and potential for interference. As such, the

⁸ *Low Power Radio NPRM* at ¶ 57.

Thruway Authority's plan for use of LP 100 stations could fulfill the statutory directive in the Communications Act to make the most efficient use of the frequency. 47 U.S.C. § 307(b).

In the NPRM, the Commission seeks input on the appropriate levels of power and antenna height for this service.⁹ The attached Exhibit A outlines how low power FM service would operate as proposed by the Thruway along a section of Interstate 87 between the Spring Valley toll barrier and the Nyack Maintenance facility. In addition, the attached Exhibit A demonstrates how such service as proposed to be operated by NYSTA can comply with the Commission's desire to minimize interference to second and third adjacent channels.

In the model set forth in Exhibit A, which was prepared by NYSTA's technical staff, the basic low power TIS station consists of a low power FM transmitter (5-10 watts output) feeding a moderate gain axial mode helical beam antenna to achieve an effective radiated power (ERP) on the order of 100 watts. The antenna would be mounted at approximately 10 meters HAAT. NYSTA would propose to use monaural broadcast to achieve both better multipath fading and, as sought by the NPRM, impose a tighter emission mask to minimize interference potential on second and third adjacent channels.

It is the intention of NYSTA to operate contiguous groups of stations in simulcast, using a common reference for carrier frequency synchronization and single source program audio origination. Such clusters would be identified with one call sign and would constitute one "station". It is absolutely imperative that the rules for this service permit such operation. Simulcast enables efficient delivery of vital traffic information in a regional corridor without confusing frequency changes, complicated signage, or interference between adjacent segments.

⁹ *Low Power Radio NPRM* at ¶ 30

The attached model demonstrates the following:

1. Although the model is for one module, two antennas, mounted back to back, or offset by an appropriate angle to compensate for road alignment, can cover twice the length of road proposed by a single module.
2. Single models can be "stacked," nose to tail, down the length of a roadway corridor, such as the path of the Thruway in the New York metro area corridor. Transmitter frequency can be locked with parallel delivery of audio as is now used in the AM-band TIS system for a simulcast "ribbon" system.

The flexibility of the design outlined in the attached Exhibit A permits application of low power FM to TIS uses while minimizing interference to co-channel and adjacent channel users and maximize the availability of spectrum to other users.

V. Conclusion

Low power FM service will greatly benefit the public. By restricting the eligibility to noncommercial entities, the Commission can ensure that the service provides needed information to the public without threatening the integrity of the commercial aural broadcast service. Even if the Commission does not decide to limit the service to noncommercial and public service entities, the Commission should consider reserving a portion of the low power FM service to noncommercial, public service entities, for which there is precedent in past Commission policies reserving portions of the broadcast spectrum. Finally, the Commission should not impose undue restrictions that would limit the ability of public service entities to offer the benefits of low power FM service in a larger geographic area than one community.

Respectfully submitted,

NEW YORK STATE THRUWAY AUTHORITY

Stephen Diaz Gavin
Jeffrey L. Ross

Patton Boggs LLP
2550 M Street, N.W.
Washington, D.C. 20037-1350
202-457-6000

Its Attorneys

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Fax: 1-313-256-9036

Sep 17 '99 13:21 P. 18

STATE OF MICHIGAN



JOHN ENGLER, GOVERNOR

DEPARTMENT OF TRANSPORTATION

TRANSPORTATION BUILDING, 425 WEST OTTAWA POST OFFICE BOX 30050, LANSING, MICHIGAN 48909
PHONE: 517-373-2090 FAX: 517-373-0167 WEB SITE: <http://www.mdot.state.mi.us>
JAMES R. DeSANA, DIRECTOR

September 17, 1999

RECEIVED
OCT - 4 1999
FCC MAIL ROOM

Honorable William E. Kennard
Chairman, Federal Communications Commission (FCC)
445 12th Street, SW
Room 8 - B2014
Washington, D.C. 20554

Dear Sir:

As an operator of an extensive Traveler Information Highway Advisory Radio System (HAR), the Michigan Department of Transportation (MDOT) enthusiastically supports a proposal by the FCC (M M Docket No. 99-25, RM-9208, RM-9242) to approve the use of low power FM Stations for a variety of purposes, possibly including HAR and other public safety issues.

Currently our HAR Systems operate in the AM spectrum under current FCC rules. We have found the AM Spectrum susceptible to interference from atmospheric conditions and other AM stations. The frequent result is poor broadcast quality. Of course, this represents a critical flow in a Traveler Information System, the purpose of which is to alert drivers to congestion, diversion routes and public safety concerns.

Based on these concerns, we have attached our reply comments for your consideration. You will note, that we are in complete agreement with comments previously forwarded by the New York State Freeway Authority. Which supports the use of low power FM stations in HAR Applications.

Sincerely,

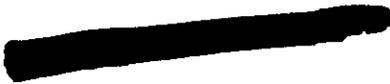
Jim Schultz
Administrator
Michigan Intelligent Transportation System (MITS)
Michigan Department of Transportation (MDOT)
313.256.9800 / Fax 313.256.9036
E-mail / Schultzj3@mdot.state.mi.us

July 20, 1999

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CORRESPONDENCE
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FILE

MM 99-25

Office of the Secretary
FCC
445 Twelfth Street, S.W.
Washington, D.C. 20554



RECEIVED

OCT 04 1999

RE: MM Docket No. 99-25

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

We're small market radio. We're in close touch with our communities and listeners who comprise what we affectionately refer to as Texoma...Southern Oklahoma and Northern Texas. And we absolutely oppose the establishment of low power radio service.

Geographically located exactly halfway between the metropolitan areas of Dallas and Oklahoma City, we are already impacted by interference from these cities either directly or through many adjacent channels. While the larger markets won't be materially affected, stations our size will do the "heavy lifting," and absorb the full force of these additional channels. Grassroots broadcasting will suffer...to the point where many will not recover.

On top of this ill-conceived proposal, we are facing the implementation of IBOC digital radio in the very near future. More interference. More economical damage. More compromise to our mission and your mandate to serve the public interests, concerns, and necessities!

One of our stations is the only local, live, 24-hour a day operation in Texoma. It has the only in-studio weather radar between Dallas and Oklahoma City. It is the resource for our listeners during severe weather. As a matter of fact, the cable systems carry our radar and our reports on their access channels. Any possible signal interference could cause major consequences...and, again, compromise our mission statement.

We are responsible, long-time broadcasters, who have invested an immeasurable amount of time, materials, manpower and community service efforts in the serious, focused pursuit of what local, small market communications is all about.

I urge you and your fellow commissioners to reconsider, and understand the potential damages to us...your small market electronic operators.

The low power FM proposal is folly.

DOCKET FILE COPY ORIGINAL

Sincerely,

Ken Taishof
President

KT/ac

cc: The Honorable Don Nickles
The Honorable Wes Watkins

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OCT 04 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

2/3/99
The individual citizen
The new digital broadcast
technology shouldn't
between "commercial" and
There shall be room for
small businesses to be
The cost of making the
handwritten were very tiny.
Thanks for your consideration
Robert Brown
MM 99-25

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R-104-3-99

OCT 04 1999

**RESOLUTION IN SUPPORT OF NEW LICENSES
FOR LOW POWER FM COMMUNITY RADIO**

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Whereas, The City of Ann Arbor is committed to the principles of free speech guaranteed in the First Amendment to the United States Constitution; and

Whereas, Citizens of our community hold the broadcast airwaves to be public property and a public trust; and

Whereas, The Federal Communications Commission (FCC) has not made affordable, Low Power (<100 watts) FM broadcast frequencies available for community use since 1978 when regulatory changes eliminated Class D FM licenses for less than 100 watts of power; and

Whereas, The passage of the Telecommunications Act of 1996 has led to an unprecedented consolidation of broadcast industry ownership, and a marked decrease in both local and minority ownership of radio stations and origination of programming; and

Whereas, The rights of free speech and a free press are threatened when access to communications media is concentrated in the hands of the few; and

Whereas, The Ann Arbor community has already demonstrated its commitment to local access through its long-term and enthusiastic support for the local community access television, Community Television Network, and its local low power radio station, WCBN; and

Whereas, The FCC is now hearing public comment on a proposal to once again offer simple, affordable, non-commercial Low Power FM broadcast licenses (FCC's MM Docket No. 95-25); and

Whereas, Non commercial radio stations operating under such a license could provide a community voice to individuals, musicians, artists, writers, activists, students, and points of view which are presently economically barred from access to their own above-mentioned airwaves; and

Whereas, Issuance of said licenses would constitute a net benefit to the social, cultural, and political life of Ann Arbor and its citizens, and to communities across the state of Michigan and the U.S.;

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List ABCDE

Therefore be it Resolved, That the City of Ann Arbor supports the concept of Low Power radio stations, and urges the FCC to fulfill its mandate as guardian of a public resource, and to enact a licensing regulation to grant affordable, simple, commercial and non-commercial broadcast licenses to citizens of this and other communities in this country; and

Be it Further Resolved, That the City of Ann Arbor supports the efforts of those who endeavor to advocate such regulatory change, and to enrich the life of our diverse community through legally establishing a commercial and non-commercial public-access radio outlet; and

Be it Finally Resolved, That copies of this resolution shall be sent to FCC Chairman William Kennard, to Michigan Senators Spencer Abraham and Carl Levin, Congresswoman Lynn Rivers, and to Ann Arbor's representatives in Lansing, with the request that they support the FCC's proposal to reintroduce Low Power FM radio broadcasting to our country.

Submitted by Councilmembers Daley and Kolb
As Amended
March 1, 1999

CERTIFICATION

At a regular session of the Ann Arbor City Council held on March 1, 1999, the foregoing resolution was moved by Councilmember Daley and supported by Councilmember Kolb. The vote was as follows:

AYES: Councilmembers Hanna-Davies, Vereen-Dixon, Upton, Kwan, Herrell, Hartwell, Kolb, Daley, Mayor Sheldon, 9;

NAYS: 0;

ABSENT: Councilmembers Carlberg, Putman, 2.

The resolution was declared adopted.

* * * * *

I hereby certify that the foregoing resolution was adopted by the Council of the City of Ann Arbor, Michigan, at its regular session of March 1, 1999.

March 4, 1999



W. Northcross, Ann Arbor City Clerk



New Jersey Turnpike Authority

ADMINISTRATION BUILDING P.O. BOX 1121 NEW BRUNSWICK, NEW JERSEY 08903
(908) 247-0900

MM 99-25

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EDWARD GROSS
EXECUTIVE DIRECTOR

September 15, 1999

Federal Communications Commission
445 12th Street S.W.
Allocations Branch
Washington, D.C. 20554

RECEIVED

OCT 04 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: The Commission

In the matter of Creation of a Low Power Radio Service, Notice of Proposed Rulemaking (Low Power Radio NPRM), MM Docket No. 99-25, RM-9208, RM-9242.

The New Jersey Turnpike Authority hereby submits its comments in the above captioned proceeding in response to the Commission's Notice of Proposed Rulemaking outlining the establishment of a low power FM radio service. As set below, the New Jersey Turnpike Authority supports creation of low power FM service for non-commercial entities, particularly public service entities that are fulfilling critical public safety functions.

The New Jersey Turnpike Authority operates the New Jersey Turnpike, a limited access toll superhighway stretching 148 miles through New Jersey from the Delaware Memorial Bridge to the George Washington Bridge including extensions. The Turnpike Authority presently owns and operates nine permanent Highway Advisory Radio stations and two portable Highway Advisory Radio trailers. These stations currently operate on 1610 KHz, 590 KHz and 530 KHz on the AM band. The Highway Advisory Radios are updated on the average 30 times per day for traffic incidents, congestion, construction, and intense weather conditions for both the Turnpike and adjoining facilities. As an active member of the I-95 Corridor Coalition, the Authority's radio systems are activated as part of the cooperative effort between agencies. When not in use for emergency broadcasts, these stations regularly broadcast safety tips, service area location, important messages from the New Jersey State Police regarding New Jersey Laws, and information on points of interest.

In response to the NPRM noted above, the Authority offers the following comments on this Rulemaking. The Authority believes low power FM stations should be limited to noncommercial operations providing vital public services. These agencies are

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NEW JERSEY TURNPIKE AUTHORITY

-2-

Federal Communications Commission
Washington, D.C. 20554 (con't)

presently limited to the AM band which is plagued with poor reception, interference and band overcrowding. For instance, the Turnpike Authority must utilize three different AM stations to cover the entire length of the Turnpike due to band overcrowding. Access to low power FM services by transportation and public safety agencies like the Turnpike Authority would ensure public service messages, travelers' advisories and critical public safety messages could reach the motorists expeditiously thereby improving the safety and efficiency of the nation's roadways.

In summary, the New Jersey Turnpike Authority favors the option of low powered FM access for Traveler's Information stations, that access to these stations be limited to non-profit agencies and the licenses be granted to Public Entities to perform public safety functions. If you have any further questions, regarding this matter, please feel free to contact me.

Sincerely,



Robert F. Dale
Director of Operations
New Jersey Turnpike Authority

RFD/DCC

cc: Edward Gross