

Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

In the Matter of

Creation of a Low Power Radio Service
MM Docket No. 99-25

To: The Commission

REPLY COMMENTS

James Madison University Board of Visitors, the FCC licensee of public radio stations WMRA and WXJM Harrisonburg, WMRL Lexington, and WMRY Charlottesville, Virginia, submit these Reply Comments in the above-referenced proceeding on LPFM.

We strongly support the initial Comments in this proceeding filed by the Public Radio Regional Organizations (the "PRROs"), the Station Resource Group ("SRG"), the Corporation for Public Broadcasting ("CPB"), and National Public Radio ("NPR")

Based on our understanding of the initial Comments of the public radio industry groups, LPFM will adversely affect public radio, in that it will result in (i) the introduction of an intolerable level of new interference throughout the FM band, with public radio bearing the brunt of the effects of new interference because of its typical program modulation; (ii) jeopardization of the substantial federal, state and private investment in public radio; (iii) an unknown (and unknowable) impact on public radio conversion to digital audio broadcasting; (iv) loss of existing public radio FM translator and satellite/repeater service; (v) loss of existing public radio service outside protected contours; and (vi) potential loss of subcarrier services, particularly radio reading services for the print impaired.

We urge the Commission not to sacrifice our public radio stations and our public radio listeners for the illusory benefits of LPFM. We urge the Commission to look for alternate ways (outside the FM band) to accommodate the proponents of LPFM, if it believes any such accommodation is appropriate. We ask the Commission to pay heed to the Comments of our public radio industry groups (PRROs, SRG, NPR, and CPB) and to treat those views as our views in this proceeding. We request that the Commission review with care the "listening tests" on the CD

ROMs submitted with NPR's Comments - those listening tests document the intolerable interference that LPFM will cause if authorized as proposed in this proceeding.

We state unequivocally our firm belief that the record in this proceeding does not support the creation of LPFM in the FM radio band.

Respectfully Submitted,

James Madison University Board of Visitors

By: Tom DuVal

Title: General Manager

Date: October 15, 1999