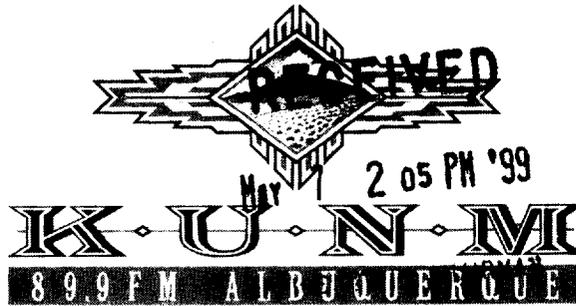


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May 3, 1999

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The Honorable William E. Kennard  
 Chairman  
 Federal Communications Commission  
 445 12<sup>th</sup> Street, SW  
 Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION  
 OFFICE OF THE SECRETARY

Dear Mr. Chairman:

We are writing to express our concern about the Notice of Proposed Rulemaking that the FCC has begun on the issue of low-power FM radio (LPFM).

It seems that standards for this service have been made without any scientific research into the interference that would result on present FM radio service. In the Albuquerque area the FM band is saturated with stations and in order to allow any new stations interference limits on 2<sup>nd</sup> and 3<sup>rd</sup> adjacent channels would have to be relaxed. We are concerned that our community oriented public broadcasting would be compromised.

Right now in-band digital broadcasting systems are being developed which will need the present interference free spectrum that present FM stations have been granted. These systems when introduced will eliminate much of the present noise and give our signal greater clarity. The proposed LPFM stations may prevent this from happening by the new interference.

We have seven translators that serve small communities on the perimeter of our signal area that would not be able to receive public broadcasting because of the mountainous terrain in northern New Mexico. We are concerned that these translators will be knocked out of service by LPFM signals that will interfere with them. These translators are already being encroached on by full power stations being established on their frequencies by organizations wanting to license full power stations in small communities where they can get signals into larger cities.

These new LPFM stations are being proposed to allow opportunities for individuals who could not otherwise get into broadcasting because of the expense of a full powered station. We are concerned that they will be used to broadcast programming from large satellite networks already being broadcast over hundreds of translators and full powered stations across the USA instead of allowing more diversity and freedom of expression by individuals. This would seem to us to be totally against the purpose of the establishment of this service.

We are also concerned that little thought has been given as to how these limited frequencies for low-power FM would be allocated in the case of conflicting applications.

We would urge that a low-power FM service not be instituted until serious consideration has been given to the issues that we have raised above. Thank you for considering our views.

Sincerely,

Ronald Cowell  
 Chief Engineer

Richard S. Towne  
 General Manager

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