

Once again I feel compelled to file a Reply Comment, this time in response to the Reply Comments of the North Carolina Association of Broadcasters and the Virginia Association of Broadcasters on October 12, 1999. Specifically, I take exception to the following statements, found on pages 6 and 7:

"Interference caused by LPFM stations is likely to knock out entire chains of translators or satellite/repeaters. For example, if an LPFM station operating on an adjacent channel to KUER-FM's Delta, Utah, translator knocked out reception of its input signal, service from seven other translators in the chain would be crippled."

This passage contains several loaded words and phrases. I don't believe that LPFM is LIKELY to cause any problems to KUER's translator, nor would it in any way KNOCK OUT reception. As I live in the state of Utah, I think I am better able to comment on the realities of this situation than those who live a couple of thousand miles away.

Point 1: Translators will use directional receive antennas, so the possible sources of interference are near the translator site or in a direct line between the translator and the transmitter whose signal it is receiving.

Point 2: KUER broadcasts on an assigned center frequency of 90.1 MHz from the Oquirrh Mountains west of Salt Lake City. A search of the REC networks database shows that by their criteria, a 10W LPFM license COULD be allocated to Delta on either 89.9 or 90.3. However, it also shows that there are 46 available channels for a 10W LPFM station, 36 for a 100W station (obviously overlapping with the 10W availability), and 16 for a Class A station! I believe that any potential LPFM licensee in or around Delta would be likely to choose a channel OTHER than one adjacent to KUER's main signal.

Point 3: The area between Delta and the KUER transmitter site is lightly populated and a good deal of it is contained in the Wasatch-Cache National Forest. Not a spot where a potential LPFM licensee is likely to live. The town of Vernon does lie about midway between the KUER transmitter and the town of Delta. However, a search of the REC networks database for Vernon shows that no LPFM station could exist on any of the frequencies 89.9, 90.1, or 90.3 MHz. It does show 15 available slots for a 10W station, 12 of which could be 100W.

Point 4: I have recently funded a feasibility study for the installation of a repeater in Sundance, Utah. This repeater would repeat the broadcast signal of station KRCL-FM, which broadcasts on an assigned center frequency of 90.9 MHz from the Oquirrh Mountains. There is an existing translator in Heber City, which coincidentally belongs to KUER, which operates on a frequency of 91.1 MHz, a first-adjacent channel to KRCL's signal. I was able to tune in each of these stations individually on my vehicle radio (a factory radio in a 1994 Ford Bronco) from the proposed translator site. However, the translator signal on 91.1 was strong enough that I could not lock on to the KRCL signal with my Wavetek SAM-I meter (S/N 17 if you care - a true relic), even though I used a directional antenna (a Radio Shack model 15-2163 if you care). This would indicate that the existing adjacent channel translator might cause problems for our proposed translator. However, the engineer who conducted the study was able to lock onto KRCL with his equipment and determined that the signal was strong enough to enable our proposed translator to be installed. He specified a precision receiver for the translator (e.g. BEXT HPTFMR20HR) and indicated that there wouldn't be an interference problem. So even assuming that someone was silly enough to try to use a channel adjacent to KUER in or around Delta,

I don't believe that the resulting situation would be any different than ours.

Even though the NCAB/VAB document was just using the Delta translator as an example, I believe that my points are valid in other cases as well. Potential LPFM licensees will act responsibly in selecting a frequency and will not purposely degrade existing services. Again, I point out that the arguments against LPFM seem to assume that a very large percentage of potential channels that would be made available to LPFM would immediately be on the air. I think the more likely case is that there will be some strong initial demand, and these licensees will select the "best" available channels. Over time, if the service proves to be viable, others will apply for the other channels which are more likely to cause interference to existing full-power stations. But look what happens in this case: if there is indeed a problem with 2nd and 3rd-adjacent channel reception with existing receivers, the manufacturers have a chance to fix this in newer models. It will most certainly not be the case that 35,000,000 people (NCAB/VAB's number) will immediately have to go out and buy new radios. As I pointed out in a previous Reply Comment, it's really no different than the IBOC case the NAB and other are pushing for. In that case, people will have to upgrade their radios to IBOC-capable at some point because as I understand it the plan is to eliminate the current analog broadcasts at some point in the future and go completely digital. In fact, it may turn out that the new radio those people go out and buy is a brand spanking new "DIGITAL READY" radio that not only has improved 2nd and 3rd-adjacent channel rejection, but also the ability to receive the new digital broadcasts when they become available. Of course, I still stand by my argument that IBOC represents an inefficient use of the FM band, so space in some other band should be allocated for digital radio broadcasts.