

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of  
Proposal for Creation of the Low Power FM  
(LPFM) Broadcast Service  
Docket No. MM 99-25

To: Federal Communications Commission

Comments of James P. Somich  
-----

October 25, 1999

**COMMENTS CONCERNING THE ESTABLISHMENT  
OF A LOW POWER FM BROADCAST SERVICE.**

I AM VERY MUCH IN FAVOR OF THE ESTABLISHMENT OF  
A NEW LOW POWER FM BROADCAST SERVICE.

The incredible consolidation of the radio broadcasting business  
has placed the entire radio broadcasting industry into the hands of  
a very few people. In my market (Cleveland) for example, Clear  
Channel Communications WILL control every important station in  
the market.

With so little competition everywhere, there is no incentive to  
provide diverse programming. Formats are chosen that will appeal

to the "lowest common denominator." If a format cannot produce immense ratings numbers, it is not considered viable.

Since the consolidation, much local programming has been eliminated and replaced by satellite delivered Pablum like "Dr. Laura" and Rush Limbaugh." Local "personalities" have been let go to improve the "bottom line."

It is impossible to find anything on the radio that is specialized and/or appeals to a minority.

IF THERE EVER WAS A TIME FOR A NEW VOICE, THIS IS IT!

Low Power FM Broadcasting's time has come. And it is the obligation of the FCC to provide for it, if at all possible technically. And I believe it is.

-----  
Comments

1) LPFM MUST provide for commercial as well as non-commercial stations. These new stations **MUST** have a way to support themselves. For over 75 years, radio stations have been allowed to sell advertising to support themselves and it has proven to be very effective. Some filing comments have no experience in running a radio station and do not understand funds needed to meet operating expenses.

These folks may be just misguided but I am convinced there are others who are trying to sabotage LPFM by keeping it non-commercial-only and at very low power levels.

2) **Both the 2nd and 3rd adjacent channel restrictions must be dropped for LPFM stations.** Improvements in receiver design (improved filters) since the rules were written decades ago will allow these restrictions to be dropped without causing interference to existing stations or planned digital IBOC signals.

3) The LPTV allocation process **MUST** use a "prohibited contour overlap" method of predicting interference, as is now easily done in the Low Power television service with the appropriate computer program.

4) The 60 meter (197feet) limitation on Class LP-1000 stations in the FCC NPRM should be increased to 100 meters (328 feet), which is the same as for Class-A full-power FM stations. This would provide for an additional 2-3/4 miles of coverage without requiring any additional power.

5) LPFM must not be subjected to a narrower bandwidth than full-power FM stations since audio quality could suffer.

6) Some form of ownership restrictions must be in place to keep this service for "local owners" so as to not be snapped up by the large corporate broadcasters.

7) The FCC should try some form of "first-come first-served" application process with five-day filing windows. If this system proves unworkable, then and only then should the FCC consider using auctions to select between mutually exclusive applicants. If auctions are considered, there must be some form of substantial "bidding credits" available to small business applicants that would allow them to compete with applicants with large financial resources.

8) Class LP-100 stations should be designed to fit in where LP-1000 stations will not fit, even using directional antenna patterns kept in the FCC database.

9) Class LP-1000 stations should include stations from 1,000 watts down to 200 watts, as long as an engineering showing proves no interference using the "prohibited contour overlap" method mentioned above. These stations should be "primary status" and protected to their 1mV/m contour.

-----

Thank You For Your Kind Attention.

James P. Somich

President: MicroCon Systems Inc.  
Broadcast Engineers  
1107 Stoney Run Trail  
Broadview Hts. OH 44147  
Tel (440)546-0967  
Fax (781)207-2557  
e-mail: jim@microconsys.com