I believe that it would be in the best interest of the public that LPFM not be approved in its current form. A lower powered service would provide more opportunities. This is simply because any station considered commercially viable will be purchased by existing broadcasters. Or any LPFM station considered any kind of threat to a full power broadcaster will be purchased by that station and promptly shut down.

99-25 is a nice dream, but I think it will fail those it is supposed to serve.

A better solution the adoption of FM band signal strength limits currently governing the use of Auditory Assistance devices. This would replace the 15uV/50m currently in force under part 15.239. Adoption of higher permissible signal strength would allow a larger number of participants to operate very small neighborhood stations with a range of 2 blocks to 1/3 mile.

Schools, Churches and other groups would be able to reach the neighborhoods the serve, but with a smaller investment in equipment. When it is necessary to expand the coverage area of one of these small stations, license free 2.4Ghz spread spectrum links may be used to deliver audio to auxiliary transmitters located say along a highway or in disparate locations within a community. Coverage is thus "tailored" to the actual need. Due to the extreme low power of these stations (approximately 10mW), separations between co-channel stations are reduced to approximately 1/2 - 1 mile.

Uses for this type of station are much wider in scope than anything proposed under 99-25. With 10mW class stations, government agencies such as FEMA could use mobile based FM transmitters to send information directly to evacuating motorists.

INS could explain entry procedures to entering vehicles in two or more languages at border crossings. BLM and NPS could use solar powered information transmitters to broadcast "point of interest" information. Corporate sponsors could combine efforts and broadcast information about services at approaching off ramps.

10mW FM is less expensive, has far superior sound quality compared to the existing AM-TIS system, is so low powered that it is economically solar powered. Since the antenna is non-cumbersome (unlike AM)it is much easier to install.

This technology is already in use overseas. Inexpensive transmitter systems are available which produce extremely high quality signals, with sophisticated multi-band audio processing, and built in digital message repeaters. Some of these use "active transmitting antennas". This is a whip antenna mounted to a hermetically sealed transmitter case measuring 5" x 3" x 1.5". These transmitters are mounted outside. Inexpensive Cat. 5 cable provides power and processed audio from a small console. Ironically, this equipment is manufactured domestically.

Though this equipment could be operated domestically, part 15.239 limits effective coverage to about 50 feet from the transmitter. This is the most restricted range in the world.

I urge the commission to reject 99-25 in favor of the solution more resembling what I propose.