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May 9, 1999

Subject: Low Power FM (Micro-Radio)

Dear Sirs,

I am a broadcast engineer and am currently employed in television, but I started in radio in the '70's. It would be almost impossible to do this today due to corporate group ownership of most radio stations. Today almost all the radio stations in Albuquerque are owned by three major corporations. A few years ago many radio stations were operated by small local entities and served their communities in a personal way. I hope that low power FM service is approved so that some of the spirit of broadcasting as it was in the past can be brought into the present.

The N.A.B. and other established broadcast organizations are, of course, opposed to low power FM, but most of their opposition is directed toward the proposed one thousand watt class. Granted, a thousand watt FM is a real station, and due care would have to be employed to insure non-interference with existing services. Few of these would be possible in major markets, but in a state like New Mexico with a hundred miles between small towns, they would provide a valuable service. I understand that there is such a low power FM service in Canada, partly due to vast distances between small towns.

The one to ten watt and one hundred watt stations would probably not cause significant interference problems if their transmitters meet tight specifications for bandwidth and spurious emissions. I think these stations could be accommodated even in major markets. They would provide a voice for community organizations, neighborhood associations and the like. Also, there are people like me who have broadcasting in their blood and would love to run their own station just "for Art's sake". With the explosion in amateur recording there is enough new music for a station to operate 24 hours a day without violating copyrights and giving valuable exposure to budding artists. (Although I realize that ASCAP and BMI fees could still apply to micro radio if they opt to use copyrighted recordings.)

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One of the reasons put forward for having low power radio is to eliminate or legitimize "pirate" radio. I agree that the last thing we need is a bunch of profane hate-mongers screaming at us with bad quality, poorly maintained transmitters. However, the air waves are supposed to belong to the public and even unpopular radical political views should be able to be aired. A few months ago here in Albuquerque, we had a left leaning pirate station on the air known as "Rebel Radio". It was eventually shut down. If the people running it had a license to protect, maybe they would have gotten their views across with a little less profanity and a little better technical quality. I've heard other pirate stations that have never been "busted", apparently because their program sounded professional enough that most people assumed they were legal operations. I only mention this because many opponents of micro radio assume that it will be similar to the worst kinds of pirate radio. I realize that there is no such thing as a good pirate station, but those who at least try to sound professional would probably want to become licensed if it were possible. Also, if you judge by the standards of some syndicated talk shows that air on licensed full power stations, there's not much that a micro broadcaster could do that would be more offensive.

I hope at least some of the proposals for low power FM are approved and that the regulations adopted promote independent, inexpensive small scale broadcasting. One scenario that is troubling is that the big broadcast groups will simply snatch up the low power licenses and use them as a sort of translator service. I hope the regulators can find some way to prevent this from happening. Also I hope that the technical requirements for the lowest power licenses are not so stringent that they effectively exclude average income people from micro broadcasting. For example, bandwidth and adjacent channel interference requirements shouldn't be as tight for one or ten watt stations as they must be for one thousand watt stations. That way micro broadcasters may be able to use already available transmitting equipment such as cable modulators or exciters instead of having to purchase expensive specially built low power transmitters. I also hope the lower powered stations can transmit from residential areas. Another issue is EAS. I hope that if the micro broadcasters are required to participate in EAS, that it can be done in some economical way such as simply rebroadcasting a full power station's EAS messages.

If low power broadcasting is approved I hope the lowest power classes will be allowed to use high gain antennas such as the yagis currently used by many FM translators. A one or ten watt station can easily cover a small town with such an arrangement.

You may have believed that all professional broadcasters are opposed to low power FM, but I can assure you that I am not the only real broadcast engineer who feels that these services could be made to work well technically and provide much needed local and diverse programming.

Sincerely,



Robert Zukowski
Technician, KRQE-TV Albuquerque, NM