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April 29, 1999

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Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Secretary,

The proposal before the FCC regarding a new class of low power FM stations has raised some concerns among the providers of radio reading services for the print-impaired. As you know, reading services provide readings from current newspapers and magazines via FM subcarrier to individuals who cannot distinguish conventional newsprint.

Subcarrier signals are fragile and subject to interference. By relaxing existing interference protection standards, many of our listeners, particularly in fringe areas, are subject to a weaker signal, if not an entire interruption of service.

If an LPFM station will not be subjected to technical filing requirements by the FCC, then an existing main channel station and/or its subcarrier must determine the potential interference problem. It should be the responsibility of the applicant to show that their proposed operation will pose no threat to such services.

(Section 255 of the Telecommunications Act of 1996 ensures that telecommunications equipment and services are readily available to those with disabilities; the FCC has stated that public radio stations using their subcarriers for commercial purposes are to "ensure that neither existing nor potential radio reading services for the blind are diminished...by the pursuit of commercial carrier undertakings.")

As a member of the National Association of Radio Reading Services, we urge you to defer action on the LPFM proposal until these important technical and policy concerns are fully addressed.

Sincerely yours,

Ben Martin
Director, Radio Reading Service

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