To: Federal Communications Commission
Washington DC 20554

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Comments of: John Jaltorossian

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October 29, 1999

In the Matter of
Creating Low Power FM radio service

MM Docket 99-25

I am a big supporter for the creation of Low Power Radio Service. LPFM will give many individuals and organizations the voice that they never had before. Presently, most radio stations are owned and operated by large media corporations who are more interested in satisfying their investor/shareholders rather than the members of the community they are operating in.

Most of the stations where I reside have coverage radius of 50-100miles average. Most have coverage stretching over and covering several counties, cities, towns and localities.

It is very difficult for me to believe that these stations are serving the communities they are licensed to, which community they are serving? Are we talking about the communities that fall within their coverage area? If that is true, than we are talking about the impossible, because there are hundreds of communities within their coverage area. Non of those stations have programs that are designed or tailored for a specific city or town, because if they focus on the needs of a specific city or town within their coverage area, than they risk losing listeners in the other cities they broadcast to.

As a member of an ethnic minority group, I like to see the creation of low power radio service because it allows me to start a small LP100 station where I reside serving the 20,000 or more members of my ethnic minority community.

Where I reside is crowded with many FM stations and the only way to allow the creation of LPFM stations in the area is for the FCC to use "prohibited contour overlap" method of predicting interference. If the FCC uses it's strict "mileage separation tables" as mentioned in the NPRM, than probably my community will never have the chance to start a LPFM station.

As a corporate accountant & business consultant, I know what it takes financially to operate even a very small radio station. Even operated by volunteering members of the community, stations still need the necessary funds to pay for other operating overhead like rent, utilities, repairs, insurance and equipment upgrades. LPFM stations do not survive unless they generate these funds by selling advertising time.

I also urge the Commission to accept and adopt the following proposals regarding the creation of LPFM Service.

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1- no entity should be allowed to own more than one LPFM station.

2- current owners of radio stations should not be allowed to own or operate LPFM stations.

3- no foreign citizens or corporations should be allowed to own LPFM station.

4- Individuals, Partnerships, Unincorporated Associations or Corporations should equally be allowed to own LPFM stations.

5- for profit or non-profit entities both must be allowed to own LPFM stations.

6- LPFM stations must be allowed to sell advertising time to generate the necessary and needed funds for operating expenses. This also allows local businesses to promote their operations through low cost advertising.

7- both 2nd and 3rd adjacent channel restrictions must be dropped for LP10 & LP100 stations.

8- LPFM stations should be allowed to broadcast in mono or stereo.

9- the "minimum operating hours" requirement should not apply to LP10 & LP100 stations and they must be allowed to have flexible operating hours.

10-The EAS requirements should not apply to LP10 & LP100 stations because of the limited coverage area they have and for financial hardship concerns.

Conclusion:

I urge the Commission to adopt its Proposed Rule as modified by the changes I have recommended above. I also kindly request the Commission to 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 like the "LP-ONE" used for LPTV. This process will allow more LPFM stations to be created. If the FCC uses it's strict "mileage separation tables" as put forth in the NPRM, many major cities will be deprived from having any LPFM station.

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