

VIRGIL H. GOODE, JR.  
5TH DISTRICT, VIRGINIA

**ORIGINAL**  
EX PARTE OR LATE FILED

MM 99-25

**Congress of the United States**  
**House of Representatives**  
Washington, DC 20515-4605

September 28, 1999

MMF  
LF Reader  
5499

**RECEIVED**  
NOV 01 1999  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

The Honorable William Kennard  
Chairman  
Federal Communications Commission  
1919 M Street, NW  
Washington, D.C. 20554-0001

Dear Chairman Kennard:

I am writing again regarding the proposal to expand the low power FM radio service in the Fifth District. As you know, I have many concerns about this proposal. Enclosed is a letter I received from Mr. Tom DuVal, General Manager of WMRA concerning this matter. He makes many good points in his letter and I would appreciate your taking our concerns into consideration when addressing this issue.

Thank you for your time. With kind regards, I am

Sincerely yours,

*Virgil H. Goode*  
Virgil H. Goode

VHGjr/cgt  
Enclosure

cc:  
Mr. Tom DuVal  
General Manager WMRA  
P.O. Box 1292  
Harrisonburg, VA 22801-1292

SEP 1 3 22 PM '99



Your NPR® Station

P. O. Box 1292  
HARRISONBURG, VA 22801  
(540) 568-6221  
fax (540) 568-3814  
wmra@jmu.edu  
www.wmra.fm

---

HARRISONBURG 90.7 \* CHARLOTTESVILLE 103.5 \* LEXINGTON 89.9 \* WINCHESTER 94.5

---

September 20, 1999

The Honorable Virgil H. Goode, Jr.  
United States House of Representatives  
Washington, DC 20515

Dear Representative Goode:

I am writing regarding the Federal Communications Commission's low power FM (LPFM) radio proceeding (MM Docket 99-25). I urge you to contact FCC Chairman Kennard and request a delay in the LPFM proceeding until digital conversion tests are completed and issues of interference are resolved.

As a public radio station manager, I am extremely concerned about three specific repercussions that the LPFM proposal may have on my station's ability to serve our listeners and on public radio listeners nationwide.

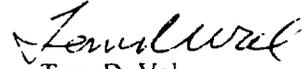
First, LPFM stations will disrupt and impair existing service. National Public Radio (NPR), in conjunction with the Consumer Electronics Manufacturers Association (CEMA) and the Corporation for Public Broadcasting (CPB), recently concluded technical studies that show that the proposed LPFM service will create interference. It is irresponsible of the FCC to proceed with its proposal unless it can be ascertained - after a thorough examination of engineering tests - that the introduction of LPFM stations will not create interference that will inhibit the quality of existing radio service.

Second, the FCC's proposed LPFM model does not take into consideration the reading services for the blind and print-handicapped offered by many non-commercial FM stations, including WMRA. Radio reading services give thousands of Virginians access to their local newspapers and other print material they otherwise are not able to read. These are broadcast on stations' SCA channels and would not be protected under the LPFM technical criteria.

Finally, it is unwise for the FCC to move forward with LPFM without first considering the impending transition to in-band, on-channel (IBOC) digital audio broadcasting. Several leading technology companies are nearing final development of a digital radio transmission standard using existing spectrum allocations. Within several months, the FCC will likely begin a complicated rule making process for digital radio. Early IBOC tests show the LPFM initiative is likely to cause substantial interference in the new digital audio systems. The FCC should fully examine the development and implementation of the IBOC digital audio broadcasting system before implementing LPFM.

Again, I ask you to raise these concerns with Chairman Kennard. While the stated policy objectives of LPFM are laudable, implementation of the FCC's proposal will negatively impact my station's ability to serve our communities and diminish the signal clarity that public radio listeners across America depend upon. If you have any questions or concerns please do not hesitate to contact me at (540) 568-7884.

Sincerely,

A handwritten signature in cursive script, appearing to read "Tom DuVal".

Tom DuVal  
General Manager