

Having read some of the comments recently filed pertaining to this NPRM, some are saying that LPFM and digital radio are mutually exclusive. I must say that this just isn't so. I have filed my comments regarding Proceeding 99-325 which pertains to proposed digital radio services. In my comments I proposed that the Commission introduce digital radio in its own RF spectrum for several reasons. If the Commission were to introduce digital radio in its own frequency band, this removes the argument that the NAB et. al. have been making all this time against LPFM. The argument of course being that LPFM signals on the FM band will make it impossible to have any form of digital radio whatsoever. Having digital radio in its own band has many advantages which I outlined in my comments regarding 99-325. Most importantly, the advantage of this approach to digital radio as it pertains to LPFM and this proceeding is that it would no longer be necessary to work around a yet-to-be-developed digital radio system. It's entirely possible that the FM band or a portion of it could be retained for exclusive LPFM use if it is indicated in the future that most mainstream broadcast listening is done on the digital band. This approach could have LPFM serve as a training ground for future full-service digital broadcasters.

Another argument against LPFM, usually coupled with the digital radio arguments, is that LPFM broadcasts would be technically sloppy compared to full-service stations. With the current state of the art in electronics, it is relatively easy and inexpensive to build low power FM transmitters that far exceed the FCC standards for frequency stability, etc. Full-service stations are really no better at this than any new LPFM station. I've seen full-service stations that overmodulate and some have even used power levels in excess of what the FCC has authorized them. Current technology will provide for very stable transmitters that will require very little in the way of attention.

As I have stated in earlier comments regarding this matter and 99-325, IBOC is NOT the future of radio. It is a voodoo-like, nearly unworkable system whose only advantage is that it can be piggybacked onto an existing analog broadcast. It's clear why the NAB wants such a system; it could kill off the proposed LPFM rulemaking and thereby ensure a radio service free from competition. The DISadvantages of IBOC far outweigh its single, solitary advantage. IBOC can never be made to work as well as a digital system which isn't designed around the too-narrow analog channels. Interference from IBOC signals in the current scheme without any new LPFM signals will be a problem, especially in major radio markets. Not to mention the audio quality of IBOC signals is dubious. There is absolutely no need to stall a decision on LPFM because of proposed IBOC signals. The choice is clear: Give the public the voice it needs on the current FM band via LPFM, and give the public a choice on a quality, viable new digital radio service in a new band where today's radios aren't obsolete overnight. IBOC belongs in the wastebasket of history. IBOC isn't worth the too-many challenges and shortcomings it has. LPFM's time is overdue in today's ultraconsolidated media environment. The public has spoken overwhelmingly--SAY YES TO LPFM!!!!

-Erich Loepke
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