

Since 1-watt "radio stations" are too small to generate enough revenue, I propose that this class of radio station be included under Part 15 rules as an unlicensed station. This amount of power is not likely to cause significant interference when used on a carefully chosen open frequency. This should satisfy the needs of hobby DJs without the need for licensing and all its inherent costs and obligations. Hobby broadcasters would then be able to cover a little more distance with their signals instead of the 250 feet or so currently allowed under Part 15 rules for the FM band. This proposed extension of Part 15 rules would entail the need for tighter technical standards regarding such transmitting devices. They would have to meet the same technical standards that apply to full-power FM stations with regard to frequency stability, etc. 1-watt "Mr. Microphone" type devices are NOT the type of transmitters that I envision. It is relatively cheap and easy to build transmitters today that meet or exceed FCC technical standards for FM broadcasting, so this should prove no barrier to ensuring that the technical standards will be met by hobby broadcasters, the type most likely interested in 1-watt LPFM stations. As Part 15 transmitters, they would have no recourse against either full-power stations or other Part 15 devices which interfere with their transmissions.

It's not very likely that everyone in a certain area will be transmitting such a signal; it's only a few people who desire to do so. At least the hobby broadcasters could reach a few listeners and gauge whether or not what they are broadcasting could evolve into a full-service radio station. And they could do so without the fear of being arrested and branded as a radio "pirate".

As I have stated before, the proposed IBOC system for digital radio isn't worthy of consideration. The signal quality which will be provided is no better than current FM broadcasts. There will be no bandwidth left for all these auxiliary services that so many people talk of. There is virtually no consumer demand for digital radio i.e. FM is good enough. The NAB and large broadcasters are behind IBOC because the Commission has taken a noticeable interest in IBOC and the pro-IBOC parties are playing this card to its fullest. They seek to squash any potential competition by saying that LPFM and digital radio CANNOT coexist. Maybe these broadcasters know deep down inside that they CAN'T compete with all this potential young blood on the FM dial. That is no fault but their own if listeners tune them out in favor of new LPFM voices. Digital radio needs its own spectrum independent of the AM and FM bands. New technology isn't ipso-facto better. The radio listener must decide for themselves whether digital radio is worthwhile. In the meantime, there is no need to put off a decision regarding LPFM and possible new Part 15 rules simply because of this unproven and possibly doomed digital radio system.

The time is now: Take action in the PUBLIC interest (not just the NAB's) and authorize this new class of FM station in the quickest manner possible.

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