SUPPLEMENT TO STATEMENT
REGARDING GRANDFATHERED STATIONS

Supplemental statement by:
Jeremy Lansman
Broadcast Consultant
C/o KYES-(TV)
3700 Woodland Dr., #800
Anchorage, AK 99517
November 15, 1999

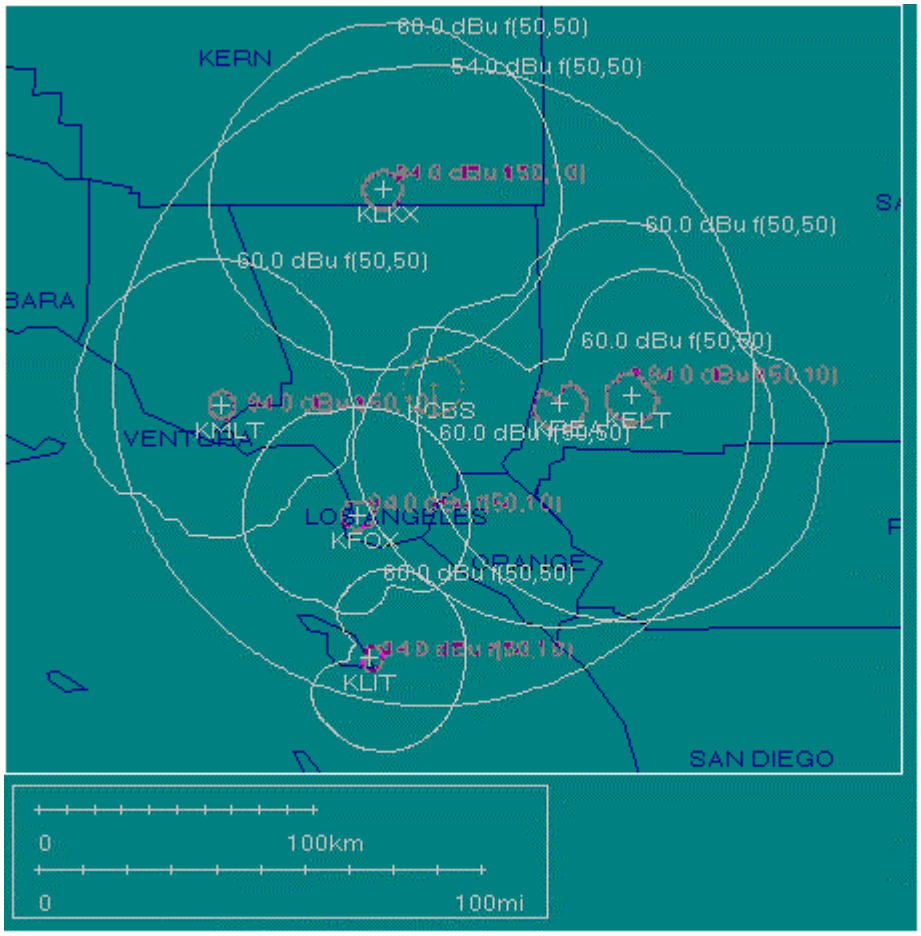
Re: LPFM

On November 4, 1999, I filed via the FCC Electronic Filing System, informal (Late filed comments) in the Low Power FM Proceeding*. I pointed out a few of the many “super power” grandfathered FM stations, and some 2nd and 3rd adjacent neighbors within these grandfathered coverage areas.

I mentioned that all Los Angeles area FM stations on Mount Wilson are superpower class B FM stations, and gave as an example, KCBS-FM. However, I did not provide data on FM 2nd and 3rd adjacent stations that might be within its coverage area, or a coverage map of the relevant stations. Since my earlier report, I have looked for 2nd adjacent FM stations (not 1st or 3rd) to KCBS and have found the following listings on 92.7, 93.1 and 93.5 MHz near Mount Wilson.

92.7	KELT	FM	A	H=V	o	100m	6.000kW	72km	93=e US CA Riverside
92.7	KMLT	FM	A	H=V	o	197m	1.500kW	77km	264=w US CA Thousand Oaks
92.7	KMLT	FM	A	H=V	o	192m	1.700kW	77km	264=w US CA Thousand Oaks
92.7	KLIT	FM	A	H=V	D	45m	6.000kW	102km	192=ssw US CA Avalon
92.7	KLIT	FM	A	H=V	D	45m	3.000kW	102km	192=ssw US CA Avalon
92.7	KLIT	FM	A	H=V	D	83m	6.000kW	102km	192=ssw US CA Avalon
92.9	KXFG	FM	A	H=V	D	100m	6.000kW	111km	129=se US CA Sun City
93.1	KCBSFM	FM	B	H=V	o	1066m	28.500kW	0km	89=e US CA Los Angeles
93.1	KCBSFM	FM	B	H=V	o	1066m	28.500kW	0km	179=s US CA Los Angeles
93.5	KREA	FM	A	H=V	o	-40m	6.000kW	46km	97=e US CA Ontario
93.5	KFOX	FM	A	H=V	o	86m	6.000kW	55km	209=ssw US CA Redondo Beach
93.5	KLKX	FM	A	H=V	o	63m	3.000kW	74km	345=nnw US CA Rosamond

Using the same methods as before, using only those facilities found above that are listed as “Licensed” in the FCC FM Engineering data base, I produced the below coverage map.



KCBS AND 2ND ADJACENT FM STATIONS

Via grandfathered super power stations, the Commission has extensive experience with contour overlap of service and interfering co-channel, 1st, 2nd and 3rd adjacent signals. Interference, if any, would be especially bad in Coastal California, and area that happens to be prone to radio signal enhancing atmospheric inversion. I believe it would behoove the Commission, supporters and detractors of relaxed 2nd and 3rd adjacent channel operation to research the record, to locate instances of 2nd and 3rd adjacent channel interference resulting from these stations. Given the serious signal overlap of many grandfathered

stations, if no record can be found, then interference, if any, must be slight indeed. If serious interference results from placement of 2nd and 3rd adjacent stations within the service contour of a much stronger station, then superpower grandfathered station files should be bulging with letters of complaint, as will those files of the smaller intruder stations.

Please find attached, the text of an e-mail from a person who attempted to find evidence of interference from the new FM facility of KBAY FM, as mentioned in my earlier paper.

Signed
Jeremy Lansman
President, Fireweed Communications Corp.
Licensee, KYES–(TV), Anchorage, Alaska.

* copies of my paper have been given to some other parties in this proceeding.

E-MAIL FROM AMANDA HURON

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please see attached the note summarizing my research from yesterday.
-amanda

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November 4, 1999
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To: Jeremy Lansman, Radio Engineer
Re: Statement Regarding Grandfathered Stations

Should the FCC create a new low power radio service, thousands of tiny new stations would be added to the FM band. One way to fit these new stations onto the band would be to relax second and third channel adjacency restrictions. Concern has been raised that, in relaxing these restrictions, these new stations would interfere with exisitng, full power stations. However, there are already many cases of the FCC granting licenses to full power stations that are second or third adjacent to each other. I researched two examples of California stations that are second adjacent to each other:
KRUZ (103.3 FM) and KXLM (102.9 FM), in the Los Angeles area; and KPFA (94.1FM), KBAY (94.5 FM) and KYLD (94.9 FM), in the San Francisco Bay area.

In a November 3, 1999 search of FCC public files on FM radio stations KXLM,KRUZ, KYLD, KPFA and KBAY, I found no letters regarding complaints of interference from or to any of the stations. KXLM, which is second adjacent to super powered KRUZ, creates no interference for that station. KBAY, which is second adjacent to two super powered stations, KPFA and KYLD, creates no interference for either one. Nor do KXLM or KBAY receive interference from the larger stations to which they are second adjacent.

Both KXLM and KBAY are many times the size of the proposed new low power stations. This research would indicate that, under the new low power radio service, second and third channel adjacency restrictions could be lifted without causing any new interference with existing, full power stations.

Amanda Huron
Washington, D.C.