

November 4, 1999

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 existing, 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 (94.1 M), 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.