

I have previously filed initial comments, and reply comments in the matter of MM 99-25. After digesting the comments, studies, discussion, attacks, and other filings in the matter, my conclusion is that the lpfm proposal will not have the desired effect that the Commission proposes. Instead, it will grant very little impact at all, if the Commission hold true to its vow to not allow for interference to prevail in any proposal, and to not prevent the implementation of IBOC DAB. The lpfm proposal, as proposed, is anything but lpfm, with many current class A stations, having less facilities than the LP-1000 class, as proposed. Not in the Commission's own proposal nor in the comments has anyone discussed these stations and the potential for upgrade. Most of the pro-lpfm comments come from the few, but very vocal minority that feel disenfranchised by the current state of media today. These few are willing to sacrifice the current relatively full FM band, for their own needs and desires, at the expense of the rest of the nation. This should not be the basis for any adoption of policy. The majority of the factual comments, along with the engineering studies show that lpfm will be harmful to the existing FM band, if implemented, and possibly have a large effect on the implementation of IBOC.

I will agree with one proposal: The Rec proposal for lpfm to be in what is now TV channel 6 is the most logical approach to the problem. This should be given some serious consideration by the Commission, as a solution for more stations, more opportunities, not the packing in of more stations into an already full FM spectrum.