

Comments of  
Ara Avedikian

To: Federal Communications Commission  
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Washington DC 20554

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October 28, 1999

RE: Low Power FM

MM Docket 99-25

I do support the creation of Low Power Radio Service. LPFM will be a great communication tool for many towns, communities, organizations and minority groups.

In predicting interference, the Commission must use a "prohibited contour overlap" method and not its strict "mileage separation tables" as published in the NPRM. If the strict mileage separation tables are used to predict interference, then many large cities will be deprived from having LPFM stations.

I also request that the Commission accept the following proposals regarding LPFM.

- 1- for profit or non-profit entities both must be allowed to own LPFM stations.
- 2- LPFM stations must be allowed to broadcast commercials.
- 3- both 2<sup>nd</sup> and 3<sup>rd</sup> adjacent channel restrictions must be dropped for LPFM.
- 4- LP10 & LP100 stations should be allowed to have flexible operating hours.

Conclusion

I strongly urge the Commission to adopt its Proposed Rule regarding the creation of low power radio service.

  
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