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March 23, 2000

Mr. William Kennard
Chairman
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

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APR 14 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Mr. Kennard:

RE: National Public Radio Petition for Reconsideration and Motion to Stay (FCC Report and Order MM Docket 99-25)

kuer FM90

101 S Wasatch Drive
University of Utah
Salt Lake City, UT 84112

801-581-6625
www.kuer.org

As a member station of the National Public Radio (NPR) system, we filed formal comments on MM Docket 99-25 on July 29, 1999. Our ongoing interest and concern in the above matter requires that we submit for your consideration, the following: (1) our concurrence with the arguments presented by National Public Radio in their Petition for Reconsideration and Motion to Stay, and (2) the enclosed two maps of FM coverage areas in Utah.

We concur with the arguments NPR stated in their Petition for Reconsideration, Section II and II(B): (1)the existing translator system represents a considerable investment in public monies that were allocated to provide public radio service to rural areas, and should, therefore, by preserved; and (2), the Commission's rules should expressly protect translator imput signals.

The two maps are submitted to graphically illustrate the potential loss of public radio service in Utah if Low Power FM (LPFM) signals are allowed to interfere with the inputs to FM translators serving rural Utah. The facts presented by these maps directly support NPR's Petition for Reconsideration.

Map 1 is a Utah highway map, which shows current political boundaries, and FCC F(50,50) 60 dBu (1 mV/m) signal strength contours of the primary service and translator signals. This reflects the system of 33 translators licensed to and maintained by the University of Utah.

Map 2 is a topographic map of Utah showing the same FCC FM coverage areas. The main transmitter signal contour is the largest circle in the north part of the state. All other circles are from FM translators. Translators nearest the main transmitter site receive their input from the primary signal. The translators further out take their input from translators nearest to the primary site.

Interference to only one translator that receives the primary signal will cut off service to an entire chain of subsequent translators serving more remote and rural areas of the state. To illustrate this point, if an LPFM transmitter were to interfere with the input signal to the Delta county translator, the original KUER primary signal would not be relayed to Parawan, Cedar, Beaver, La

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Verkin, St. George, Washington County, Kanab, Beaver County, or Fillmore. This means the entire southwest corner of Utah would lose public radio service. These small rural communities cannot support their own public radio stations. They depend on the FM translator service for their all their public radio needs.

A major portion of this translator system was initially built in the 1980s with PTFP/NTIA funds. To throw away that system by allowing LPFM signals to interfere with translator inputs would be to throw away that significant public investment. In addition, this same mechanism also devalues the investments of local entities in rural communities who funded translators for the express purpose of bringing a public radio service into these otherwise under-served rural areas. We believe the FCC should not permit this valued rural public radio service to be lost.

We also believe that implementing LPFM prior to establishing standards for a terrestrial Digital Audio Broadcasting (DAB) in the U.S. is short sighted.

We request that this letter and attached maps be entered into the official record of these proceedings.

Respectfully submitted on this, the 23rd day of March, 2000 by:

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Cc: Albert Gore, Vice-President of the United States
William Kennard, Commission Chair
Michael Powell, Commissioner
Susan Ness, Commissioner
Harold Furchgott-Roth, Commissioner
Gloria Tristani, Commissioner
Michael Leavitt, Governor, State of Utah
Orrin Hatch, Senator
Robert Bennett, Senator
Merrill Cook, Representative, District 2, State of Utah
Jim Hansen, Representative, District 1, State of Utah
Kevin Klose, President, National Public Radio
Kathy Dole, National Public Radio

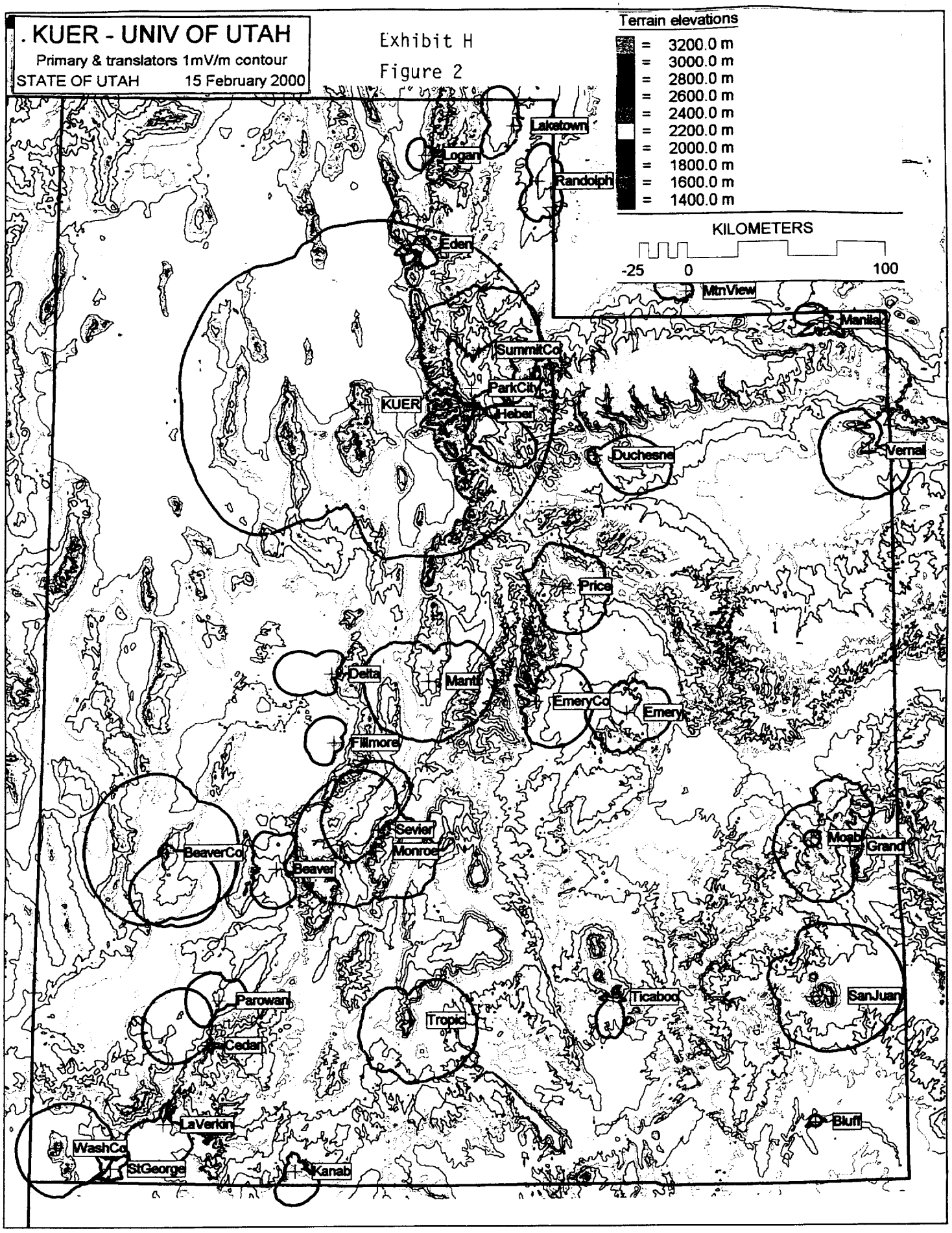
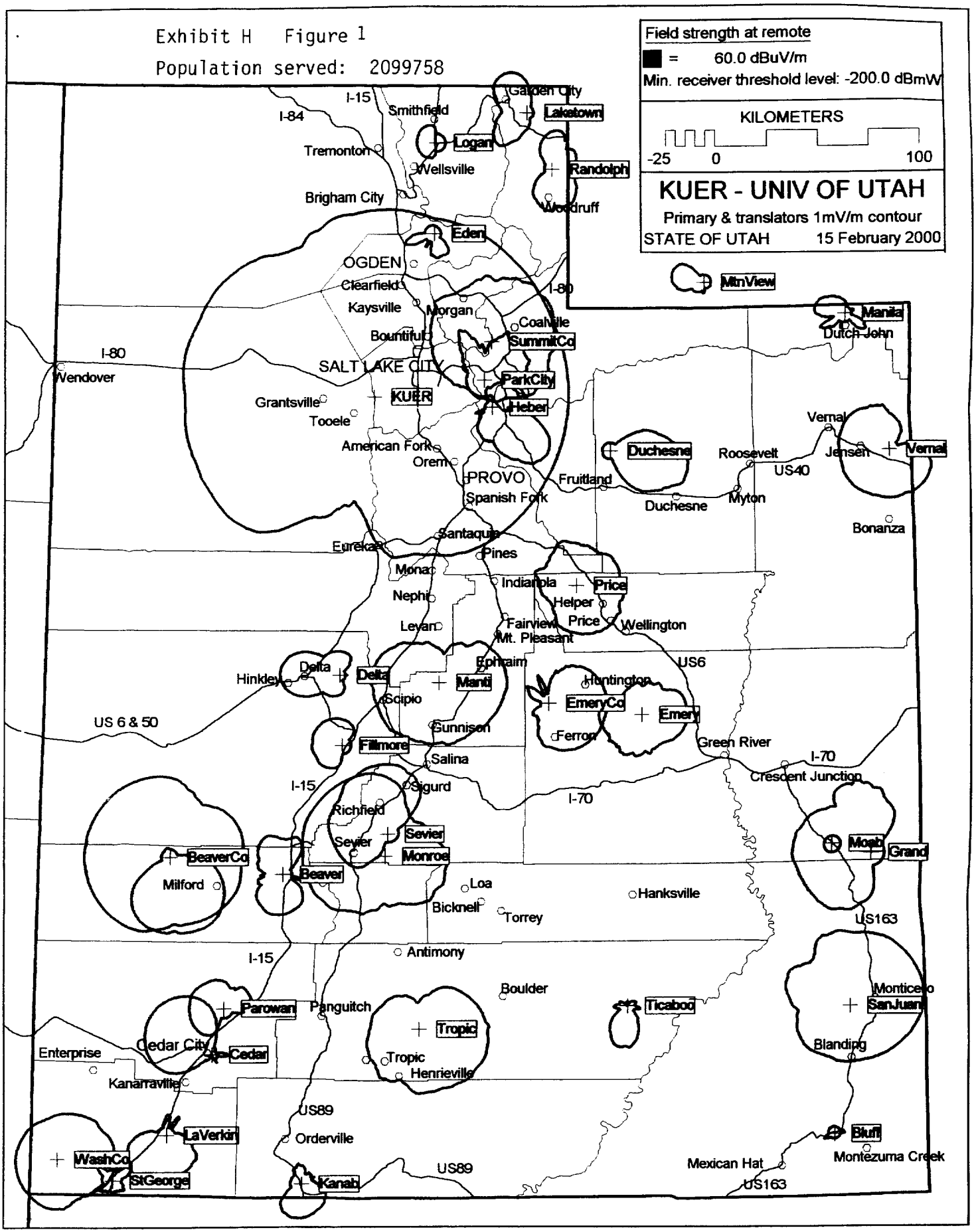

. KUER - UNIV OF UTAH
Primary & translators 1mV/m contour
STATE OF UTAH 15 February 2000
Exhibit H
Figure 2
Terrain elevations
= 3200.0 m
= 3000.0 m
= 2800.0 m
= 2600.0 m
= 2400.0 m
= 2200.0 m
= 2000.0 m
= 1800.0 m
= 1600.0 m
= 1400.0 m
KILOMETERS
-25
0
100
Laketown
Logan
Randolph
Eden
MtnView
Manila
SummitCo
ParkCity
KUER
Heber
Duchesne
Vernal
Price
Delta
Manti
EmeryCo
Emery
Fillmore
Sevier
Monroe
BeaverCo
Beaver
Moab
Grand
Parowan
Tropic
Ticaboo
SanJuan
Cedar
LaVerkin
Bluff
WashCo
StGeorge
Kanab

Exhibit H Figure 1

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