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MAY 22 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

CHAIRMAN KENNARD
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC

REFERENCE-LOW POWER FM

Dear Chairman Kennard,

I am concerned about low power FM that the commission is proposing. I had a real life experience with the type of interference that is identical to the type of interference of the proposed Low Power FM. My experience came after hurricane Hugo which, as you know, did massive damage to South Carolina. The radio stations I owned in Florence, South Carolina were completely destroyed by massive wind and rain that flooded the entire station when the roof blew off. Being a dedicated broadcaster plus the operator of eastern South Carolina's dedicated emergency station WJMX-FM 103.3 mhz, FCC EBS CPCS-1, I was deeply concerned when we could not serve the public during a time of crisis.

The station was insured and we were able to reconstruct the facility in a few months. To make sure the station would never be in a "DISABLED" situation again I filed for and was granted a CP to build a translator atop the center of government, public safety and emergency preparedness the Florence, SC City/County Complex. My idea was if the main station (WJMX-FM 103.3 mhz) was down we could always transmit from the complex and provide emergency backup, information and life saving signals to the area. Otherwise the translator (103.9 mhz) would function as intended under the FCC rules.

We built the translator that was "originally" applied for and assigned to a frequency of 103.9 mhz (third adjacent up on the FM Band) to function with the main signal of WJMX-FM 103.3 mhz. I was shocked with the amount of interference that the "70-watt", 103.9 mhz, third adjacent, type accepted, legal under FCC rules, properly installed and maintained translator caused the main channel of WJMX-FM 103.3 mhz. It completely destroyed WJMX-FM's main signal in downtown Florence and surrounding area. There was chopping in and out, dead spots, snaps-crackles and pops plus break up and complaints from the public. I could not let this device stay on the air because of the interference and inability to deliver a reliable main signal. We shut the translator down and determined the problem was "third adjacent interference", the same frequency spacing as the new FCC proposed Low Power FM spacing.

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I am confused that if a FCC type accepted, real life, well intended, low power, properly licensed and installed translator caused this much interference on a third adjacency, what will hundreds of these type stations do to the FM band? I am a sincere broadcaster who puts the public first, loves the radio industry and operates legally. If this happen to me then it will happen to the whole FM band with Low Power FM proposal. We are about to duplicate the same overcrowding and interference clutter on FM as on the same massive scale that took down the AM Band.

Now after all the AM band problems, deterriation and interference, etc., the FCC is actually eliminating AM stations to "clean up" the AM band. Why repeat the same mistake twice? Why not find additional frequencies or spectrum space like you did for the AM expanded band and not jam these tiny stations that generate real interference between current FM stations? Remember it was the larger inland distant FM stations that served the coastal public the night and following days of Hurricane Hugo. There was no local FM on the air during the storm and distant FM's served the coastal public well. Why jam up the band with interference that could shut out the safety net of larger stations that can be so valuable in a time of public crisis and emergency.

I felt it was the right thing to do to contact you about this identical real life Low Power FM comparison. The claims of interference are not overstated infact, I am worried that it might be worse that we know. I lived with this problem with just one device not hundreds or thousands. Please be sure of all your real life facts before you allow this wave of interference to take the FM band down. I experienced it by accident in a real life scenario with good intentions but you the have time to reconsider this and examine all the facts. With all the new technology developing what will this interference do to future signals such as digital or to our ability to serve the public years from now. I can assure you that the claims of interference are realistic. Please think twice before we destroy something that is working well, operating in the black and providing a real service to the public, the current FM band.

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