

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC

In the matter of ()
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Amendments of Parts 73 and 74 to Improve (MB Docket 19-193
The Low Power Technical Rules ()
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I am the operations manager for KGCE-LP/Modesto which signed on June, 2015.

On the whole, while one or two of the proposals (eg. protection of TV Channel 6) may be controversial, the Amendments proposed in this Docket are acceptable and reasonable.

I would urge the Commission, however, to open further discussion on other issues of particular importance to LPFM stations that were “tentatively rejected” by the Commission at this time,¹ such as an increase in power of LPFM stations (eg. “LP-250”), and to allow LPFMs the option to use contour analysis rather than distance separation to evaluate potential interference to other stations.

An increase in power for LPFMs will be the simplest solution for LPFMs to remain competitive in our markets. Many LPFMs, including ours, struggle to even reach our 60dBu contours because of co-channel interference from distant stations. Our station, as an example, has a co-channel full power station 80 miles to the east; This station limits our actual reach to under 3 miles. Our station also had a co-channel “interferer” 80 miles to the north, and likely will have one again in the next year or two (when that channel is awarded again in Auction 106).

Respectfully submitted,

(electronically sent)
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¹ Footnote 15.