

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of )  
 )  
Proposal for creation of Low Power ) RM-9208  
Broadcast Service )

COMMENTS ON PETITION FOR RULE MAKING

TO

Secretary to Commission  
FEDERAL COMMUNICATIONS COMMISSION

1. PREFACE.

Historically many of this countries early radio broadcast stations were started by individuals. The legendary KDKA was started by Dr. Frank Conrad out of his garage. Today the majority of broadcast facilities are owned by huge corporations with no connection to many of the communities they serve. Some of these corporations currently own or control upwards of 200 radio stations each. There is little opportunity for an individual to own his or her own radio station without large resources, just to get the license. With the concentration of media in a hand full of corporations and organizations the average individual citizen has little or no access to the broadcast airwaves through ownership. I would like to see this changed by the establishment of a Low Power Broadcast Service.

2. WHY THE NEED FOR A LOW POWER BROADCAST SERVICE.

As a Broadcast Engineer, a former applicant for two 80/90 F.M. channels, and current SBE Frequency Coordinator I see the need to create and/or modify the current Class D allocations on the F.M. band. The F.M. band is the prime aural media in United States at this time and it is not subjected to Skywave conditions that plague the standard broadcast band. I would encourage the Commission to permit these channels to be granted on a first come first served with preference to individuals with no broadcast ownership. The next two groups to be considered would be schools, colleges, community organizations, churches, etc. who are currently operating at the 10 watt level and want to up grade to as much as 100 watts. The third group would be the owners of Daytime A.M. facilities who would like to provide a night time service, but up to now have not been able to do so.

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**3. TECHNICAL REQUIREMENT CHANGES NECESSARY TO ACCOMMODATE THIS NEW SERVICE.**

I am proposing that the application process be simplified, much like an STL application. Since the proposed Low Power Channels would be on a drop in basis, as needed and as it fits, protecting the current licensee's 1 Mv. Contour would be paramount importance in minimizing interference. This could be simply demonstrated by a computer channel study. The proposed site could be verified by one 7.5 Minute Topography Map. No F.A.A. study would be necessary if the proposed tower is under 200 feet and is not in an approach path to an airport. Transmitting equipment for this proposed service should be Type Accepted to minimize interference to other licensed broadcasters. Within modern receiver design, the commission should look at modifying the interference requirements for 2nd and 3rd adjacent channels. This would open up additional channels for Low Power Broadcasting. I am recommending that Transmitter Power Output (TPO) for the proposed Low Power Service be between 10 and 100 watts.

**4. OTHER CONSIDERATIONS.**

The cost of a Low Power Radio Station could provide sufficient coverage to serve a small community or a section of a larger community. The cost of constructing a Low Power Radio Station would be comparable to the cost of setting up a full power amateur (ham) radio station. Housing projects, local neighborhoods, retirement communities are but a few of the beneficiaries of Low Power Broadcasting who's need for communication and entertainment are not being served adequately by the majority of broadcasters, who's prime motivation is profit. These stations would also provide an avenue for the would be announcer/disc-jockey to hone their skill for advancement in the broadcast industry.

Respectfully submitted,



Thomas F. Nornhold,  
Broadcast Engineer and Owner,  
T.N. Communications