RM-9208

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

In the Matter of	)	FCC RM- 9424
	)	
Proposal for Creation of Low Power FM (LPFM) Broadcast Service	)	
	)	

To: FCC/ Mass Media Bureau

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Response to Petition RM-9242

By way of introduction, my name is Michael Hemeon and I have been in the radio and television industry for over 23 years in an engineering capacity. I hold an FCC Extra Class Amateur Radio License and a General Class Commercial Radiotelephone License. I am a certified Professional Broadcast Engineer by the Society of Broadcast Engineers. My present position is Principal Engineer for one of the major television networks.

I am strongly in favor of the majority of the points made by the petitioner. There are a number of points I wish to expand upon along with a some I disagree with as described herein.

In the matter of ownership of radio stations by minority groups. I agree that an LPFM service would accomplish this better than any other present form of public communication. A portion of Pirate Radio stations, especially in large urban areas, are operated by ethnic groups that do not have access to any other form of mass

communications. Their "niche" market would not be profitable for even the smallest commercial station; except perhaps for one or two hours a week.

A LPFM service could also be used to teach English as a second language and assist in the assimilation of these new Americans. The proposed LPFM stations should be allocated on a commercial basis and assigned to FM channels 221 (92.1 MHz) through 300 (107.9Mhz). The community that the station serves should support the station and not rely on donations, or support from the taxpayers in the form of local, state, or federal aid.

The implementation of an LPFM service would be the most efficient use of radio spectrum and would not take revenue away from existing broadcast facilities as many fear. Many small merchants in a community cannot afford to advertise on radio because of the prohibitive costs. In addition, it is wasteful because most small business serves a small area and the additional coverage provided by a standard AM or FM station is not cost effective.

I disagree with some of the classes of stations that have been sugggested in the petitioners LPFM SERVICE PROPOSAL. I don't think it would be prudent to license any sort of temporary Special Event Station; especially in large urban areas. Most of the requests for such permit would come from event operators that would operate on weekends. Realistically, if any interference occurred, it would not be dealt with until after the event during the week and that point it would be moot. This class of service (LPFM-3) would increase the workload at the commission by increasing interference complaints

and interrupting the regular FM service. I feel such a service would be better served on the AM band .

I agree with the petitioners assessment for the proposed LPFM-1 and LPFM-2 classes of service with the following exception for the LPFM-2 Class. I think technical-operating parameters should be the same as those stations in the old Class D FM 10-watt category.

I must disagree with the Ownership requirements as they are stated in RM-9242. I believe that essence of this service is to provide local community radio, the 50-mile ownership rule should be reduced to 20 or even 10 miles. Ownership should be restricted to one station, not three, as suggested by the petitioner. The petitioner argues that LPFM stations be allowed to own three LPFM stations to compete on some level with standard commercial FM stations. This, I feel, is completely contrary to the premise and spirit of the proposed LPFM service.

I strongly agree that only type-accepted transmitting equipment be allowed for all classes of LPFM service. Type-acceptance is mandatory to insure pure spectral emissions and prevent interference to existing commercial FM outlets.

I have also carefully read RM-9208 and it is not technically sound and not worth commenting on. Implementation of RM-9208 would cause chaos on the broadcast bands and should not be considered for further action by the commission.

As stated before I believe that RM-9242 should be seriously considered. Americans need such a service. America is a "mixing bowl" rather than a "melting pot" and there are many disenfranchised Americans that have aright to be heard.

The face of America is very different than it was when the Communications Act was enacted in 1934 and I believe that the implementation of some form of Low Power FM Service will provide many of these diverse Americans a voice in our society.

Respectfully submitted,

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