

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC

In the matter of:)
)
Improvements to the Low Power FM) RM-11749
(LPFM) Radio Service)
)

**COMMENTS OF REC NETWORKS AND
REC BROADCAST SERVICES, LLC (“REC”)**

REC Networks strives to assure a citizen’s right to access the airwaves and strongly advocates for the Low Power FM (“LPFM”) broadcast services. REC Broadcast Services, LLC is a Wisconsin corporation that provides broadcasting engineering and consulting services for FM broadcasting specializing mainly in the LPFM service (collectively “REC”).

As the original petitioner of the above captioned proceeding, REC is reinforcing its support for the changes to the LPFM and FM translator services set forth in the original *Petition for Rulemaking*. We have so far seen hundreds of comments from LPFM station board members, station volunteers and the most important and most impacted group of people, the general public that listens to LPFM stations. We have heard many stories of the challenges that LPFM stations face within their “three mile zone” in an attempt to better serve their local communities.

LPFM stations should be permitted to use boosters

While mentioned in the proposed rules (see page 67), we did not elaborate our support for an LPFM station to be able to own and operate an FM booster in lieu of a translator as a part of an LPFM station’s 2-translator limit. The ability to operate an FM booster will permit a small number of LPFM stations, especially those in the west to be able to fill in major gaps of their service contour which would not be serviceable by the primary LPFM station. While it may be possible, based on spectrum availability to operate a translator in that area, it would not be spectrum efficient if the terrain is properly conditioned to support a booster. The use of a booster

in lieu of a translator would be more spectrum efficient because in the secondary services, this unserved spectrum is already being set aside for the LPFM station.

In order to properly implement the ability for LPFM stations to operate booster stations, we would need to add an additional hurdle for LPFM stations to assure that if the (100/97/94 dBu) interfering contour of the FM booster overlaps the service contour of another facility on a second or third adjacent channel, a showing must be made that the FM booster's interference contour, using the U/D ("Living Way") method will not interfere with second or third adjacent channels. In addition, in order for a booster to receive programming to be rebroadcast, it must come through an alternate source such as microwave. This would mean that an FM booster operated by an LPFM station should not be subject to §73.860(b)(2) of the Commission's Rules.

Motions for Extension of Time

REC is aware of two Motions for Extension of Time that were filed in this proceeding. One was filed by Nikolaus E. Leggett ("Leggett") and the other will be a joint request by the Radio For People Coalition ("RFPC"). The Leggett request is also asking the Commission to consider an undocketed Petition for Rulemaking filed by Leggett and Don Schellhardt. REC feels that their petition should, if the Commission wishes to move it forward, be given its own comment period on its own merit. REC does oppose the Schellhardt/Leggett proposal as it adds complex eligibility requirements for LP-250 stations including some that have been addressed in RM-11749 in a more simplistic manner. RFPC is requesting more time to further evaluate the technical aspect of the REC proposal. REC will cooperate with RFPC in their analysis. With that, REC supports RFPC's request for a brief extension of time to assure a complete record in this proceeding.

Conclusion

REC will address any issues raised in this proceeding in a Reply Comments filing. For now, we just wish to reinforce our overall support of RM-11749 and address the need for the ability for LPFMs that would otherwise technically have a need for the service be able to access FM boosters as a method of improving their coverage within their 60 dBu service contour. We also support the RFPC request for a brief extension of time to assure a complete record. REC thanks the Commission and especially the Audio Division staff for their hard work and patience in all activities related to the 2013 LPFM filing window and we hope that sometime in our lifetime, there will be another opportunity for new LPFM stations.

Respectfully submitted,

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