

Before the
FEDERAL COMMUNICATION COMMISSION
Washington, D.C.

In the matter of:)
)
LPFM Licensees Propose Necessary) RM-11753
Improvements to the Low Power FM)
(LPFM) Radio Service)

COMMENTS OF JOHN PAVLICA, JR.

As an engineer, a licensed amateur radio operator, and as a consumer, I wish to make the following comments regarding the Low Power FM (LPFM) Radio Service and potential improvements.

1: Ownership.

I suggest LPFM stations be owned and operated by both non-profit and not-for-profit organizations to service the LOCAL public good. I suggest they be permitted to transfer their license to another non-profit if they cannot financially maintain their station on the air.

2: Power.

I suggest consideration for a maximum of 250watts ERP at 33m where it will not cause interference to co-channel or first adjacent stations only.

3: Callsigns.

I suggest that the –LP suffix be optional in cases where the callsign is unique, or where simple written permission from the owner of the other service using the same callsign has given their permission while under their ownership. If permission is granted, then the –LP suffix shall not be required.

4: Underwriters/Commercials.

LPFM stations do service the local public good, but let’s face it; they are not free to operate. Cost for electrical power, equipment, engineering, equipment maintenance and in some cases tower rental or studio rental all add-up. I would like to propose that not only can LPFM stations have underwriters for each 15-minute segment of their programming, but be permitted to have up to two 30-second or one 60-second “commercial” sponsor per 15 minutes of programming, or up to 4 minutes per hour. This would be permitted as long as the income from the sponsors do not exceed the costs of station operation, in other words, it is not a profit-making venture.

In addition, I would propose the rules be changed for LPFM stations so that they can promote LOCAL fundraisers for non-profit organizations (i.e.: Make mention of a local church-sponsored dinner for a local cancer patient, etc). I also believe that the local LPFM should be able to have on-air fundraisers for their own station’s benefit for operational costs.

I ask that the FCC please consider these brief comments to improve the LPFM service.

Respectfully submitted,

John Pavlica, Jr.