

Cohen, Dippell and Everist, P.C.

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

In the Matter of)
)
LPFM Licensees Propose Necessary)
Improvements to the Low Power FM) RM. 11753
(LPFM) Radio Service)

Comments
on Behalf of
COHEN, DIPPELL AND EVERIST, P.C.

The following comments are submitted on behalf of Cohen, Dippell and Everist, P.C. ("CDE") and is in response to the Public Notice released by the Federal Communications Commission ("FCC") on July 31, 2015. CDE and its predecessors have practiced before the FCC for over 75 years in broadcast and telecommunications matters. The firm or its predecessors have been located in Washington, DC since 1937 and performed professional consulting engineering services to the communications industry.

The undersigned is licensed as a Professional Engineer in the District of Columbia and has been in continuous employment with this firm or its predecessors for over fifty (50) years.

This engineering statement is with reference to the Petition filed by Low Power FM Advocacy Group ("LPFM Ad Group"). While the thrust of the Petition, RM No. 11753 ("Petition") is primarily legal it has considerable engineering ramifications. The Petition if it is allowed to proceed as proposed may be joined by RM No. 11749.¹ On Page 36, the Petition

¹FCC Public Notice, dated May 15, 2015, Report No. 3022

suggests that higher power is required. In addition to legal relief, the LPFM Ad Group's petition requests primary status in combination with its suggested need for higher power. It is this firm's opinion that it is fraught, in many markets, with potential technical and interference situations. The FM, band based on the present Rules, has been and is a mature service.

This firm suggests that LPFM Ad Group and others who have an interest in improving this technical service to the community should work with others in the field such as advanced by the Broadcast Maximization Committee.²

Respectfully Submitted



Donald G. Everist, PE

Date: August 31, 2015

²See Diversity and Localism (MB Docket No. 07-294) and AM Revitalization (MB Docket No. 13-249).