

RM-9242
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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Before The Federal Communications Commission
Washington D.C. 20554

In the matter of proposal for the creation of the low power FM (LPPM) broadcast service as it pertains to FCC-RM-9242

To: Federal Communications Commission

For some time now the commission has been reveiwing a petition for rulemaking entitled RM-9242. I have filed comments in FULL support for a much needed low power FM broadcast service, and then again I have filed comments to the comments on RM-9242. I am glad that the commission is seriously looking into the possible creation of such local low wattage service, but what we need now is a notice of proposed rulemaking (NPRM). It is imperetive that this issue of low power FM be given a NPRM and not a notice of inquiry (NOI). As you can see by the comments filed in support of RM-9242 and the comments opposing RM-9242 now would be the time for a NPRM. We do NOT need any more time for additional comments that would be generated by a NOI and thus further drag out the process of establishing a viable much needed LPPM service. In other words, you, the FCC, got your comments and information as pertains to RM-9242 back in July when the comment period closed. As I have read a lot of these comments dealing with RM-9242, there is an overwhelming force in FULL support of creation of LPPM broadcasting that comes from the general public which are in effect the ones who are supposed to benefit from any and all broadcast services. Assigning a NOI is a foolish and time wasting step that is not needed in the road to having a successful LPPM service. What we need is a NPRM immediatly. Please DO NOT give in to the pressures of the money hungry NAB.

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There is one other point I wish to bring up before the commission in regards to having a NPRM issued on RM-9242 or any possibility of a viable LPFM service and that is power levels and use of LPFM. It is my belief that when the commission is studying the possibility of LPFM I mean just that. Low power FM is supposed to be LOW POWER. Three thousand (3KW) is NOT low power to me. One hundred (.1KW) is low power and an antenna height of 100 feet above average terrain would probably do fine for a small town and not cause ANY interference with the proper filtration. People say that LPFM would be doomed if the power levels were not correspondant with those of low power television service. I disagree. The whole purpose of LPFM is just that, LOW POWER, just enough to cover an immediate community. Some of these people out there are just demanding too much. They (the people) in support of LPFM should be glad that the FCC is seriously considering a legal LPFM service and take what the commission gives them, should LPFM become legal. A power level of 100 watts at a height of 100 feet is not rediculous at all, but anything less than that would be. The other subject that irks me is the use of LPFM. I believe that LPFM service should be commercial free. We have radio service now that is commercial and it is terrible. Money is the bottom line and not program content. LPFM service is not supposed to make someone rich overnight. It is supposed to fill the needed gap that commercial radio skips over because they (commercial radio) are are too busy playing advertisements. The whole other reason for LPFM would be for non-commercial local radio service. People say if LPFM were limited to low power levels it would be inneffective for advertisers. SO WHAT. Lets have non-commercial LPFM service that would serve a community with pertinent programming and not try to make someones pockets fill with money. As far as I can see we are on the right track, the FCC is considering allowing LPFM and there is strong public support from ordinary citizens that want local, low power FM service, so I urge you, the FCC, to issue a NPRM on this subject immediatly, as the time, and place in time, warrants the NEED for LPFM.

Sincerely

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Ted Ham II
10-20-98