

I believe that the FCC is taking a very positive step in proposing regulations for new Low Power FM broadcast stations. LPFM stations would be able to serve their communities in many different ways. As stated in the NPRM, LPFM station, by nature will contain locally originating programming targeted at the local community of license. I believe that it is important for LPFM stations to be required to follow many of the regulations currently in place for full power FM stations. For example, station identification is very important; not only does it tell other broadcasters where the signal is originating, it clearly tells the public what station they are listening to in a common manner, which they are accustomed to. Other issues, such as hourly power reading may not be as important. Perhaps only a monthly test and calibration of output power should be required of LPFM.

I believe that it is essential that LPFM be noncommercial in nature. The communities of license are much better served with this type of programming; however another option would be to allow commercial programming, but limit commercial air-time and stipulate certain criteria for the airing of commercials themselves. Low Power stations can certainly survive on limited budgets, but I do not think that Underwriting is effective enough.

With regards to political programming, it is very difficult for a LPFM station to air political programming. I believe political candidates view small stations as ineffective and therefore do not take advantage of them.

With regard to part 83, I do not think it is necessary for the commission to force a finite license period upon noncommercial LPFMs. While it is a nice thought to be able to allow others the opportunity to broadcast, a significant investment will be needed to create and maintain these stations. The commission could not seriously expect a noncommercial licensee to give up its license, and its investment, after a certain time period unless the commission proves the licensee is undeserving of the license. I think a license should automatically be renewed unless seriously challenged by the community served (meaning, the licensee did not serve the public well).

I do not believe the Commission should mandate electronic filing. While electronic filing will be very efficient, I think the Commission should always allow for paper filings as no where near 100% of the public has access to the Internet.

I believe that Boosters and Translators should have to accept interference from LPFM stations. For the most part, by their nature, Boosters and Translators do not originate signals from the community they transmit to. LPFM stations, WILL be directly serving the community they will be transmitting to. Therefore, it is in the public interest for LPFM stations to have priority over Boosters and Translators.

I'd like to address two things not directly mentioned in the NPRM. The first is that I believe any regulations passed should contain a migration path for LPFM station into Digital Broadcasting. While I know the Commission has not yet finalized digital broadcast for radio, I think it would be wise to leave this door open for LPFM and once the regulations for digital radio are complete, the LPFM regulations should be amended to allow for migration to digital.

The second issue, is regarding existing Class D stations. In the 1998 Biennial Review the Commission mentioned Class D stations extensively under the section, "Revisions to

Class D Rules.” However, in this NPRM Class D’s were only mentioned once: “An eighth class, Class D, was discontinued in 1980, although applications for renewal and modification of these existing licenses are still accepted.”

I believe that the Commission should at least include a migration path for existing Class D stations into LPFM regulation. The surviving Class D stations show that LPFM can work. I think that it would be in the FCC’s best interest to promote these stations into LPFM service. The Commission should not merely classify them as 1-10 Watt “microstations,” but it should give them the opportunity to move to LP100 and LP1000 as, essentially, a reward for the continued operation and service to the public.

Finally, in my opinion, if too many regulations are placed on the LPFM stations, they are going to have a negative effect and cause the entire LPFM idea to fail.

Sincerely,

David Brouda