

I would like to offer my support for extending licenses to Low Power FM (LPFM) stations. I think that the division into three classes is a good way of dealing with these types of stations, but I am most interested in seeing the so-called micropower stations (25 watts or less) be allowed to operate.

Regarding the rules under which they operate, I would suggest LPFM radio might be best treated as "community-based" radio, by which I mean frequency preference would be given to non-profit organizations rather than commercial ventures. While I am not opposed to commercial ownership of these small stations, I prefer to see them used as a "soap-box" for political candidates, religious or educational groups, and/or independant musicians. To promote this diversity of usage, I would recommend that no one group or individual be given more than one LPFM license, meaning "one group, one (and only one) transmitter." Nor should any organization that owns or operates a commercial FM station be eligible to operate a LPFM station.

I also agree that technical limitations be placed on LPFM operators to reduce interference with commercial FM signals. Perhaps some type of signal rejection or detection test could be applied to ensure that properly tuned receivers tuned to an adjacent frequency do not audibly detect LPFM signals outside a small distance from the transmitting antenna. Considering the typically urban locations of the transmitters, perhaps this distance should be limited to the smaller of "the nearest property line to the antenna" or 100 feet.

Due to the extremely robust nature of digital signals and current computer state-of-the-art in error recovery and noise rejection, it is very unlikely that any LPFM generated interference that is acceptable in an analog system will be detectable in any digital receiver scheme. I think that fears of interference with future digital systems are not based in fact.

Regarding currently unlicensed radio operators, I strongly support offering them licenses to operate. And while I understand that the Commission is not requesting comment on offering the "uncooperative pirates" LPFM licenses, I still strongly feel if their signals never exceeded 25 watts that that they should not be blanket disqualified. I regard their actions as "peaceful protest" to a bad rule, one that I hope the Commission will change soon.

Thank you for offering me the opportunity to comment,

John Deters