

Greater Media, Inc. (GM) on August 11, 1999, requested that the Commission extend the reply comment period for the Notice of Proposed Rule Making (NPRM) concerning the proposed Low Power FM (LPFM) Radio Service until November 1, 1999. The petition did not appear in the Electronic Comments Filing System until August 19, 1999.

I have filed comments generally in support of the NPRM. I am opposed to an extension of the type described by GM.

GM requested the extension of time because they do not have the resources to go through the fifteen hundred plus comments that have been filed to date. I do not believe the Commission is obliged to extend the reply comment period because commentators have a lack of resources. It is bizarre to believe that the Commission is under an obligation to hold up the process because GM associates cannot be taken from other projects to process comments and because other associates will be on vacation. The Commission's work would never be completed if it had to modify its schedule to respect the circumstances of all the commentators.

I am an individual and I do not expect the Commission to extend the period. In selective reading of the comments I am convinced that a vast majority report that LPFM is in the public interest. This vast majority would want the LPFM proceeding to continue to a successful conclusion without delay. I plan to make replies to comments that interest me most, mainly those of religious broadcasters and those incorporating interference studies. GM can also be selective to match its capabilities.

GM also requests the extension so that additional technical studies may be completed concerning the impact of the proposed LPFM radio service on the proposed IBOC DAB. However, the creators of the proposed IBOC DAB technology are in a better position than GM to determine if the LPFM proceeding should be delayed. Some of the creators have participated in the comment process and none have asked for an extension of time to file reply comments.

The Commission's attention is drawn to the comments of USA Digital Radio, Inc. (USADR), of August 2, 1999. USADR reports their field testing is in process and will be completed before the end of the year. USADR "anticipates that preproduction systems will be operation in early 2000, with commencement of commercial service later that year."

While USADR requests that the Commission not publish LPFM rules until after field testing is complete, there is absolutely no indication in their comments of any anticipated problems should LPFM stations be activated without third adjacent channel interference protection. All of their concerns are directed towards the proposed removal of second adjacent channel interference. The phrase "third adjacent" does not even appear in their comments.

While I do not suggest that the LPFM proceeding be further delayed, should the Commission decide otherwise because of the desire to obtain IBOC DAB technical information through reply comments based on field testing, I suggest the Commission divide the LPFM proceeding into two phases.

Phase one of the LPFM proceeding would involve the expedited incorporation of noncommercial LP1000 stations that provide co-channel and first and second adjacent channel interference protection and that otherwise

incorporate current requirements and privileges of Full Power stations. Phase two of LPFM would involve microradio, LP100, and LP1000 stations that only provide co-channel and first adjacent channel interference protection. Phase two could be delayed until after the results of IBOC DAB field testing are known.

Thank you for your consideration.

Kenneth W. Bowles