

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of
Proposal for Creation of the Low Power FM
(LPFM) Broadcast Service
Docket No. MM 99-25

To: Federal Communications Commission

Reply-Comments of Gary Patzel

Gentlemen:

I believe that LPFM must include both commercial and non-commercial stations to be successful. I prefer to operate an LPFM station as a semi-commercial business because I would not otherwise have enough time or desire to make it as successful as I might wish.

I believe that a community should receive the radio service it is willing to support. The 100 meter HAAT limit for LP-1000 stations should be approved unless it would remove the opportunity to establish several LP-100 stations in the vicinity of the LP-1000 station.

I agree that LPFM service should be authorized without 2nd- and 3rd- adjacent channel restrictions and that primary status should be extended to LP-1000 class stations.

LP-1000 should include stations operating with 200 to 1000 watts of power.

If new LP-1000 stations are not required to protect existing co-channel and 1st-adjacent channel LP-100 stations, a displaced LP-100 station should be permitted to relocate to an available channel.

LP-100 stations should be primary to FM translators and boosters. A Grandfathered interference protection should be applied to translator and booster service existing before the creation of LP-100 radio unless the public prefers otherwise.

Antenna height limits proposed by the FCC in MM 99-25 for LP-100 stations are excellent for my purposes.

A 1-10 Watt AMicroradio Service secondary to all other FM radio services should be open to both commercial and noncommercial applicants, however, this class of station seems best suited to areas of lower population where conflicts could be regulated mostly by local authorities.

Transmitter certification requirements for AMicroradio and LP-100 stations should be minimal. Such stations should protect each other from interference unless otherwise mutually

agreed.

Ownership restrictions should be applied to LPFM to keep it from being usurped by individuals or groups who already own a prevailing form of mass media or spend the majority of their time away from the area in which they have an antenna site. Local ownership should be preferred, but this should not prohibit ownership by a U.S. citizen who intends to become a local resident within a specific period of time, such as 90 days.

I approve of the AProhibited Contour Overlap≡ method of predicting interference in major radio markets to include the use of directional antennas. I believe that the AMinimum Distance Separation≡ method would be efficient when applied to license applications from residents of less populated areas.

LPFM must not be required to present a narrower bandwidth than full-power FM stations if audio quality would be reduced. I also agree that all sub-carriers other than stereo may be dropped to prevent interference. LPFM stations should be required to keep modulation within limits.

AM station owners with a night-time power of less than 250 Watts should be allowed to apply for LPFM but should certify that they will divest of the AM station within 180 days if awarded the LPFM license.

I prefer a Afirst-come first-served≡ license application process with a reasonable filing window. I also prefer a lottery rather than an auction to select between mutually exclusive (MX) applicants.