

# 89.7



# WCPE

Great Classical Music, 24 Hours A Day

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October 7, 1999

Ms. Magalie Roman Salas, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, D.C. 20554

Dear Secretary Salas,

Enclosed please find one original and ten copies of our formal comments in reference to a *Petition for Rule Making* filed on August 2, 1999, to allocate 87.9 MHz on a nationwide basis for emergency message transmissions, FCC RM-9719.

Please stamp the tenth copy as our official receipt and return it to us in the pre-addressed, prepaid envelope.

Please contact me immediately if any additional material or clarification is desired.

Thank you for consideration of our opinions and suggestions.

Sincerely,

Deborah S. Proctor  
General Manager

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

OCT 12 1999

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In the Matter of:	)	FCC RM-9719
	)	
Notice of Proposed Rule Making	)	
and Order <i>Allocation of 87.9 MHz</i>	)	
<i>on a Nationwide Basis for</i>	)	
<i>Emergency Message Transmissions</i>	)	Filed August 2, 1999

**Comments of Educational Information Corporation**

Educational Information Corporation (EIC) operates Radio Station WCPE in Raleigh, North Carolina.

We feel that the current Emergency Action System (EAS) along with safety signaling and current highway warning procedures is sufficient for the purposes of protecting the public. If any additional warning via radio system is needed, it should be on the specifically assigned frequencies already allocated at the upper portion of the AM Band. The same detection and automatic interrupt functions could be used as proposed in the instant petition.

Additionally, miles of highway could be "tagged" simply by running a small wire on the ground, or a few inches below the ground along the affected portions of the highway route -- the wire acting as a small near-field antenna. It would cost pennies, and could be abandoned after it has served its purpose. Nothing could be more simple, easy, and practical.

We note that this idea will not work well in the FM band, because of the much shorter wavelength and multipath problems which would be inherent with trying a "leaky line radiator" at that frequency. However, the leaky line radiator at AM frequencies is very well approximated by a plain wire a few inches underground or adjacent to the pavement, and the wire and the signal can go around curves, under overpasses, and everything else one would encounter in a highway situation -- including following the road through tunnels and steel bridges.

We feel that it would be much more in the public interest to use the frequency of 87.9 MHz for Low Power FM, the same perhaps being said for the frequency of 108.1 MHz. *We strongly feel that these two frequencies should be reserved for LPFM.*

Because we feel that the FM Band is already congested enough, we do not believe an additional service should be allocated to it, especially when far-better alternatives exist. Therefore, *we strongly object to the Federal Signal proposal insofar as it relates to using a frequency in or near the FM broadcast band.*

Respectfully Submitted on October 8, 1999,



Deborah S. Proctor, BSEE, CPBE  
President, EIC