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Dear FCC Commissioners,

It was with great pleasure that I read what has become known as "The FCC's NPRM for Low Power FM Broadcasting." Under the direction of a new Chairman, many of us have hope that there exists a chance to undo the damage caused by the elimination of Class D broadcasting and the consolidation caused by the so-called "Communications Act" of 1996. Both of these Congressional mistakes have given the Commission a bad name as the resultant enforcement has harmed good people who were morally guilty only of trying to serve their communities. We, the People, now call upon the FCC to "do the right thing" by restoring the rights and priviledges that many Americans enjoyed until twenty years ago.

It is clear that the authors of the NPRM are clear headed individuals who also desire to serve the public interest, but my greatest concern is that they face a David and Goliath situation in which the status quo will fight with very big guns to protect its cash cow, a multibillion dollar a year advertising industry. These Commissioners must be either (1) very naive, (2) in possession of a political playbook and capable of trickery beyond the most capable imagination, or, hopefully, (3) remarkable individuals who sincerely believe that they can conquer against some stiff competition.

My second greatest concern is that if the NPRM survives the lies and distortions strewn in its path, it must not have any loopholes that will allow it to be usurped, corrupted, or otherwise made to be ineffective by its enemies. There shall undoubtedly be many such efforts, some of which will be well disguised. They must not be allowed to succeed.

Although I agree almost entirely without reservation with most aspects of the NPRM, there are a few areas in which I would like to provide comment. As an engineer working in the communications industry, I am more qualified to address the technical issues rather than those bureaucratic, which I acknowledge are no less important.

I believe that it is in the hearts of the Commissioners to "do the right thing," but it must be said that there exist strong sources of evil that will try to preserve their "ownership" of the public trust that truly belongs to us all. Some foot-draggers have attempted to stall the NPRM process, further evidence that the time to "fill in the gaps" is now. Without further ado, following are my comments that specifically address the various elements of the NPRM:

" 1. ... a third, 'microradio' class of low power radio service that would operate in the range of 1 to 10 watts on a secondary basis."

I believe that "microradio" is the crown jewel of the NPRM. While there already exist licensing structures to authorize FM broadcast stations for radiated powers of at least one hundred watts, there presently exists no legal means to serve a small community with a low power station in excess of Part 15 limits.

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" ... We are proposing that LPFM stations not be subject to certain technical rules currently applied to other classes of radio service."

A simplified licensing structure is essential to the success of microradio. Imagine a scenario whereby one could acquire a driver's license, but only after a period of training and examination equal to that of the pilot of a Boeing 767 aircraft, all the while the governing body (and powerful lobbying groups that benefit from the unjust structure) re-iterates that one is indeed allowed to drive a car so long as they follow the unrealistic regulations.

Please note that support for a simplified regulatory structure and set of technical rules does not constitute support for equipment of poor or undocumented design and performance. Existing license holders deserve to continue to operate in a controlled environment that requires the existence of strong type acceptance criteria for these new users, albeit without cumbersome or unnecessary bureaucracy.

"2. ... As a general matter, we seek comment on whether any new services established should be operated strictly on a noncommercial basis."

I have read the opinions of many more qualified individuals who, for varying reasons, assert the need for commercial operation. I strongly disagree with their narrow reasoning.

Some well-intentioned persons within the commercial broadcasting industry state that noncommercial stations would not be economically viable. They fail to understand that microradio stations would follow different business models. Some microradio stations would ally themselves to a parent; the Pacifica Foundation has (until very recently) been a good example for half a century. Others would enlist large numbers of volunteers.

Some not so well-intentioned persons within the commercial broadcasting industry also state that noncommercial stations would not be economically viable. Their motivations are more sinister and include the hope that they will be able to usurp the process and create their own microradio networks, which, of course, would carry the advertising content of their mother station.

Some persons who would consider themselves microradio pioneers believe that allowing commercial operation would cause the current big money interests to be a friend rather than a foe. This is a terrible means by which to make policy and, like the Iran-Contra affair, is unacceptable.

It is my belief that if microradio is made to be totally and absolutely commercial and underwriting free, that the possibilities of the previously mentioned usurpation would be greatly reduced. Those who truly wish to serve their communities are not motivated by a desire to use the airwaves to create wealth for themselves.

"5. Petitioner [Skinner]... a limit of three LPFM stations per owner and no party could own more than three stations in a single metropolitan statistical area."

While I agree with this proposal which would reduce the likelyhood of the usurpation by commercial interests mentioned above, it has a loophole in that a collaboration of ten individuals would be able to own thirty stations. We must not allow repeater networks of microradio stations.

"7. ... Petitioner [Leggett]... using a single FM and a single AM channel nationwide... Licensees would be permitted to build their own transmitters, not subject to Commission approval..."

I believe that this single FM channel proposal is unworkable in today's congested environment, and that AM microradio should not be a subject of this NPRM as many of its issues are mutually exclusive of those of FM

microradio. I would strongly object to the operation of non-type accepted equipment within any existing frequency allocation in excess of Part 15 limits, and the existing licensees should have the reasonable expectation that they not experience interference due to the inferior equipment of another party. Some have expressed concern about the cost of the type acceptance approval process, but my industry experience shows me that the Commission has made great improvements in this regard in the last few years. Bear witness to the existence of a wide variety of type accepted four watt CB (Citizen's Band) transceivers costing less than fifty dollars that technically function as desired.

"... Petitioners ... low power radio could serve the needs of small, niche groups, including minority groups (particularly linguistic minorities)..."

This assertion is clearly demonstrated by the change in both ownership and content of the stations found within the FM broadcast band today versus those that existed twenty years ago before the unfortunate political horse trading in Congress that destroyed Class D broadcasting. The current regulatory structure guarantees that private individuals, even those with incomes in the ninety-fifth percentile and strong technical backgrounds, would never have a chance to acquire a license to operate an FM broadcast station. This is wrong when with today's technology, it is conceivable that one could technically create a clean but minimal microradio station for much less than one thousand dollars.

It is no coincidence that today's rules have harmed minorities and other disenfranchised parties. The current broadcasting establishment has a system that generates huge sums of cash, and they do not wish to upset its equilibrium. Thus, instead of minority programming, one finds that same bland programming ad nauseum, and sadly, in a town with only fast food restaurants, everyone eats fast food. Such is the current state of affairs on the FM broadcast band.

"9. NAB... NPR... other radio broadcaster organizations, and a number of individual licensees oppose the petitions..."

I now regret having made generous donations to NPR over the years. While their programming may have more depth than that of the big three, they too have become not only lazy and complacent, but are now also engaged in spreading propaganda unfavorable to microradio. While we know that their assertions that microradio stations will cause airplanes to plunge from the sky are ridiculous, the public is understandably cautious. Of course, they fail to inform that same public that airplanes stay aloft just fine in other countries, such as Canada, Brazil, and Italy, where microradio is alive and well despite much less regulation than proposed by this NPRM. Logic would have it that a ten watt station is much less likely to cause problems than a ten thousand watt station with the same emissions mask.

"10. ... liberalization of our local radio ownership rules over the past few years has led to increasing ownership consolidation."

And it is the duty of the Commission to "serve the public interest," even if it requires some effort in undoing the damage caused by a greedy and short-sighted Congress.

"11. Additionally, the Commission received over 13,000 inquiries in the last year from individuals and groups showing an interest in starting a low power radio station."

This is a remarkable finding; it illustrates a high level of dis-satisfaction with the current status quo. And there are many more individuals and groups who have not sent such an inquiry because they learned that such hopes are presently futile.

"12. Accordingly, we seek comment on whether a low power radio service could provide new entrants the ability to add their voices to the existing mix of political, social, and entertainment programming, and

could address special interests shared by residents of geographically compact areas."

Today's manifestation of commercial broadcast stations are generally unconcerned with "niche" programming because it generates little or no revenue. I once lived in a rural area near a town of 1600; while the idea of a commercial broadcast station serving the needs of this community is laughable, it is just the material of which microradio dreams are made.

"... Numerous commenters state that alternative sources of information and entertainment are not readily available to dissatisfied speakers and listeners through the acquisition of an existing frequency, leased time from full power stations, an internet website, or internet webcasting, the last three of which do not require a license."

The focus of this NPRM is not about the ability to lease time from an existing station nor is it about internet broadcasting, it is about changing a structure that has been unjust for twenty years. Only then will the voiceless truly have a voice.

I recently read a press release from the NAB with yet more misleading anti-microradio content in which they suggest that the internet is a much more viable means to communicate with a large number of geographically diverse individuals, and those hoping for positive change should instead take up internet broadcasting. If this is indeed such an effective tool, I would invite them to encourage their members to abandon their existing licenses and take up internet broadcasting; it would do wonders for the radio spectrum.

"... internet access is not sufficiently mobile and ubiquitous to be considered a substitute for radio broadcasting's capability to reach the public, despite some opponents' contentions to the contrary."

While the availability of the internet may be universal and complete in the future, there is still no justification for the current state of affairs. This is a wrong that must be corrected.

"15. ... As an initial matter, we do not intend to create a low power radio service on any spectrum beyond that which is currently allocated..."

"17. We propose to add any new low power radio services in the FM band..."

It would be unwise to discuss AM microradio within this NPRM; there are simply too many issues that are disparate between AM and FM broadcasting.

"19. ... Commenters should also address whether all low power (and microradio) services should be limited to noncommercial operation, and whether eligibility should correspondingly be restricted to those who would qualify as noncommercial licensees under our current rules."

As mentioned above, I strongly believe that microradio should be exclusively for non-commercial purposes, and that there should be underwriting information broadcast by such stations. The underwriting of today's so-called "public" radio stations has, in many instances, become indistinguishable from conventional advertising. The Commission will have to understand that the term, "noncommercial" includes more than nonprofit.

"20. ... We seek comment on whether all LPFM stations, whether primary or secondary stations, should be permitted to seek authority to use radio broadcast auxiliary frequencies."

It would only be just to allow the use of the auxiliary frequencies on a secondary basis. I realize that these frequencies are congested in many urban areas in which unscrupulous spammers of the airwaves unjustly monopolize their use, but that is an enforcement issue irrelevant to this NPRM.

"22. ... two distinct classes of service: (1) a primary LPFM service class with an ERP limit of 1,000 watts (designated "LP1000") and (2) a secondary class with an ERP limit of 100 watts (designated "LP100")."

There already exists a licensing structure for proposed stations operating at or in excess of one hundred watts. Therefore, it is my presumption that the LP1000 proposal has been created to bypass the existing structure that become a mess like a hyacinth choked waterway due to two decades of legislative abuse and regulatory neglect, otherwise I see no reason for such a proposal when the existing structure can presumably be repaired. Conversely, America does need the LP100 proposal in order to restore Class D broadcasting.

"... We also seek comment on the advisability of establishing a very low power secondary "microradio" service with ERP limit of one to ten watts."

The microradio proposal is the crown jewel of this NPRM. It would allow disparate, poor, minority, and otherwise concerned people to serve their communities. America desperately needs such a licensing structure. The NAB's expressed fear of such a proposal is rather damning evidence of their desire to fight meaningful change rather than shedding their own complacency and ineptness.

"30. ... LP100 service ... 30 meters (98 feet) HAAT."

While I accept that similar limits would be acceptable during the early days of microradio, I would hope that the Commission would provide online access to mapping and contour programs in a meaningful manner. It is a fact that many microradio stations would operate from the primary residence of their owners, and those who were blessed with a mountain top location would be barred from obtaining a license with such a HAAT requirement. It is my hope that future tools would allow the applicant with an unusually high HAAT to reduce his or her power level in order to satisfy the computer's contour generating guidelines.

"34. We seek comment on the creation of a third class of LPFM service, which would be intended to allow an individual or group of people with very limited means to construct a [very localized] broadcast facility..."

One can only imagine the wide range of programming that could be available with such a service. There would also be local information in some rural areas where there is presently none. Surprisingly, neither the petitioners nor the Commission has mentioned that many of the capable people presently in the industry learned many of their skills at Class D stations or at unlicensed stations. A microradio class would fulfill the needs of both the missing Class D and the presently unlicensed stations alike. I must address the latter, as their use of non-type accepted equipment is indeed a danger to the integrity of the FM broadcast and aviation radio spectrum. Now is the time for positive change.

"... This class would be similar to that proposed in the Leggett petition, except that it would not be limited to a single designated channel."

While I am pleased to see the omission of the "single designated channel," I believe that the existing users of the spectrum deserve the protection provided by requirements mandating the use of type accepted equipment.

"... We seek comment on whether such a class of service should be restricted to noncommercial applicants, open to commercial service, or both."

As I mentioned above, applicants should be of a noncommercial nature not simply to thwart the corruption of the proposed service, but also to aid in ensuring that the applicants have a desire to serve that is greater than their desire to use the airwaves, a public trust, for their own financial gain.

"35. If we adopt a microradio service, we believe there should be an FCC transmitter certification requirement..."

"... We do not believe that a certification requirement would overly burden small operators, given the recent streamlining..."

I strongly believe that such transmitter certification requirements should have emissions mask requirements that are just as stringent as those for today's existing high power FM broadcast stations. This does not create an undue hardship, and is an important tool in protecting the existing licensees.

"... We seek comments on this proposal, including not only burdens of compliance, but specific harms that could result from not requiring transmitter certification."

Failure to provide such certification could give some credence to the opponents of NPRM. The problems that would be caused by the entry of "amateur" equipment are real, and have been demonstrated in at least two documented cases of interference to aviation radio traffic by unlicensed operators. The possibility of interference to low band VHF television and to existing FM broadcast stations due to spurious emissions and splatter should be obvious, and one only need to look at other spectrum allocations in which persons have used non-type accepted equipment with unacceptable results.

Future uses of the FM broadcast band will include IBOC transmissions whose informational content in generally closer to the edge of the emissions mask than those of conventional analog wideband FM transmissions. For this reason, all licensees must be vigilant about the width of their transmissions. Type acceptance procedures should exist to address this concern without imposing undue bandwidth limitations.

"36. ... While a single station operating from 1 to 10 watts ERP may not pose a serious threat for 2nd- or 3rd- adjacent channel or IF interference, where the interference range might extend only a few hundred feet, we are concerned about uncertain effects of the combined interference potential of possibly many such stations operating on the same channel in the same general area..."

Upon moving to California's Silicon Valley, I was alarmed at the high level of the noise floor on the HF, VHF, and UHF frequencies both in my neighborhood, and at my place of employment, but this has little effect on the FM broadcast (and other FM) frequencies due to FM's "capture effect." Of course, the contribution to the noise floor of one hundred such microradio stations is not as great as that from a conventional multi-kilowatt station with similar spectral content.

"... We also seek comment on the extent to which a very low power service would adversely affect full power stations in their current operations or eventual transition to digital."

While the effect of type accepted microradio stations upon existing users would generally be inconsequential, tight emissions masks need to be observed by all stations to ensure the integrity of the IBOC signal.

"37. We invite comment on the merits of a very low power "microradio" class of LPFM service. While we are cognizant that many commenters believe that one watt would be insufficient power for any LPFM service..."

A microradio class of service should exist regardless of whether or not one thinks that it can be useful; that decision should be left to the applicant. While it is true that a large broadcaster whose sole purpose of existence is to make large sums of advertizing money for its owners would be uninterested in a one watt allocation, others would be glad to have a democratic structure in which they would legally be able to serve their community. I know of a person who lives in the middle of Oakland's

Chinatown, a small square about a half mile on each side, filled with people who primarily speak Cantonese. This woman could serve her community very well with a one watt transmitter and a rooftop antenna.

"... If we were to adopt a microradio stations class, should such stations be required to protect each other against interference?"

Initially, yes, it is only just that a licensee be protected. However, after the service matures, it may be necessary to re-visit some of these rules.

"40. ... We recognize that an approach based on distance separations could result in fewer LPFM stations and that additional stations could be "squeezed in" if a contour overlap methodology were employed."

"... use of minimum spacings would facilitate not only a streamlined application process, but would also enable a quick automated "self-check" of frequency availability before an applicant files its application..."

While I believe that the initial implementation should be based upon minimum spacings, I would hope and even expect the Commission to revise this policy as contour mapping programs become more widely available. On some locations, the use of such a system could greatly increase the number of available allocations.

"41. ... we invite comment on whether low power stations of a particular class should be permitted to accept interference from other stations, including interference from other low power stations."

The level of accepted interference will vary from station to station, thus I believe that it would be best (and easiest) to allow each potential applicant to make their own determination.

"Depending on our initial experience in authorization of LPFM service, should we later consider a more sophisticated and spectrally efficient approach?"

Yes, and I would expect this as the technology becomes less and less expensive. It would serve the public interest to have a contour mapping program integrated into the Commission's online database.

"42. ... Some commenters ... believe these protections [2nd- and 3rd-adjacent channel] should be retained to prevent interference and/or protect future digital terrestrial radio service."

These concerns are easily addressed by ensuring future stations' strict adherence to a well defined emissions mask. It should also be noted that there presently exists no installed IBOC user base. Any such receivers shall employ Year 2000 level technology, or better. It should also be noted that the NAB mindset is one of stations with radiated powers that are two or three orders of magnitude greater than those addressed by this NPRM.

"44. Relaxed interference standards for low power FM stations may be the only way to "find" sufficient spectrum in medium and larger markets to create any new viable service of 100 watts or more."

Relaxed interference standards are prudent given that the NPRM is for low power stations, and such standards should reflect the station's radiated power. While the number of possible allocations without such relaxed restrictions, I believe that the appropriate future use of contour mapping software would allow for more low power stations.

"45. ... our tentative conclusion not to include 3rd-adjacent channel protection requirements for any LPFM service."

This only makes sense as it does not appear to result in a measurable

erosion of the coverage area of any existing station.

"46. ... assess the level of risk of increased interference to stations in existing FM services that would result from permitting LPFM stations to locate without regard to 2nd-adjacent channel spacing for this service..."

One cannot imagine a problem with 2nd-adjacent channel spacing of LP100 and microradio stations, however, I believe that the Commission should undertake some study to determine the true nature of the resultant problems, if any.

"... the state of receiver technology and the ability of receivers to operate satisfactorily in the absence of 2nd-adjacent channel protection."

It is possible to imagine the existence of an inexpensive receiver with extremely poor selectivity, however, the lowest common denominator should not be least capable receiver in existence. And again, IBOC receivers available to the consumer will incorporate the latest technology as none will have been produced before the year 2000.

"47. ... consider one or more variations of IBOC proposals that would use the outer "edges" of a channel's specified bandwidth and/or portions of the adjacent channel to transmit a digital signal."

While the current IBOC proposals contain informational content right up to the "edge" of the existing analog signal's bandwidth, the amount of content near the "edge" is not disproportionately large.

"... In the existing radio environment, USADR suggests that 2nd-adjacent channel interference from analog FM signals would not pose an interference threat to its IBOC signal."

This should be no surprise as this has been known for over a decade by digital (packet) radio users that mix with analog users in other services.

"48. ... The inclusion or exclusion of 2nd-adjacent channel protection requirements for LPFM stations would greatly affect the extent to which LPFM service could be introduced and, therefore, to the extent possible, we would prefer not to adopt any such requirements for LPFM stations."

It would not be unreasonable for the Commission to perform an independent study to ensure that this is indeed true, particularly for the proposed LP1000 stations. Microradio stations should be permitted to avoid 2nd-adjacent channel restrictions based on the valid technical merits, and not based on "the extent to which LPFM service could be introduced."

"49. ... Could a strict spectral emission mask and/or a reduced channel bandwidth for LPFM stations play a significant role in reducing the potential for interference..."

The strict spectral emissions mask is the best means to accomplish this task. Proposals to reduce the bandwidth would reduce the value of LPFM, particularly for high quality audio enthusiasts, and a significantly reduced channel bandwidth could create problems for some existing receivers. It is unlikely that more than a few would desire to use SCA, therefore, this probably is not an issue.

"... could potential interference to digital radio be minimized by such measures as filters and other digital receiver improvements?"

There is no time like the present to make the statement that digital receivers must adhere to good design principles.

"... Would our proposal to certify transmitters... be useful in minimizing interference to digital service?"

It is essential for the protection of the existing stations as well as

other users of the radio spectrum (e.g. aviation) that only equipment meeting strict type acceptance criteria be used.

"50. ... Such stations could create only very limited areas of harmful interference, especially if we impose additional technical modifications to reduce their interference potential."

The possibility of such interference must be minimized as far as possible by type acceptance standards whose emissions requirements are no less substantive than those for conventional FM broadcasting stations.

"51. ... require FCC certification of transmitters used at all LPFM stations, which we believe would be necessary to ensure compliance with out-of-channel emission requirements..."

If a strong type acceptance policy is implemented, the 2nd-adjacent channel issues will largely disappear.

"... We seek comments on this proposal, including not only on burdens of compliance, but specific harms that could result from not requiring transmitter certification."

While type acceptance will undoubtedly drive up the expense of the creation of an LPFM station, that cost is small compared to the damage done to other parties, by non-compliant equipment. Said parties include, but are not limited to, low-band VHF broadcast television, other FM broadcast stations, aviation navigation, and other aviation communications.

"... We also ask whether a modulation monitor should be required or, alternatively, whether transmitters should be certified with built-in modulation limits."

I would like to see this choice left to the designer of the equipment. If a "built-in" modulation limit is technically feasible, it could be implemented in a "fool proof" manner, thus assuaging such concerns.

"53. ... the extent to which an increased emission attenuation requirement would reduce the potential for 2nd-adjacent channel interference, assuming no 2nd-adjacent channel spacing requirements."

All of the filtering required for the achievement of type acceptance should be internal to the type accepted equipment, thus making it unlikely that the equipment would be operated without these protections. Many type accepted devices, such as cordless phones and CB radios incorporate such "built-in" protection for a very low cost.

"54. ... commenters are invited to consider generally the relationship between an LPFM emission mask and protection to digital signals."

The LPFM signal should be expected to meet a mask as tight as that required for conventional high power broadcast stations. With such protection, the much lower power of the LPFM station will means that problems co-existing with digital stations will be few and far between.

"55. ... A reduced bandwidth in combination with a strict emission mask would offer even more protection."

A reduced bandwidth would lower the audio quality of the LPFM station, and could cause some problems for receivers of inferior design.

"56. We inquire about the operational effects of reduced bandwidth on LPFM stations. First, would LPFM signals be received by existing radios; for example, car radios, home stereo systems, and boom boxes?"

It is impossible to predict how a reduced bandwidth signal would be received by the thousands of different receivers in existence. A cheap

"boom box" owned by myself comes to mind as it appears to loose the pilot tone when receiving a strong signal of poor quality.

"... A narrowed channel bandwidth could also restrict or preclude the use of baseband subcarriers by LPFM operators..."

The market for baseband subcarriers by LPFM operators would be extremely small because of (1) the limited coverage area of an LPFM station, (2) the likelihood that the LPFM station would be of a noncommercial nature and would not contemplate providing such services, and (3) the fact that SCA is becoming obsolete as its users gravitate towards satellite, wireless, and internet based services.

"... Would prospective LPFM operators be willing to sacrifice the use of subcarriers in return for the ability to broadcast a narrow band radio signal?"

While I believe that the use of SCA is unimportant to the vast majority of the potential LPFM stations, the quality of the audio signal is important for the service. LPFM stations should enjoy the use of the same wide bandwidth carrier as that of the existing FM broadcast stations.

"... Could the loss of LPFM subcarrier services such as those typically provided by full power FM stations be detrimental to the public?"

Very few people would be affected if there were to be no LPFM subcarriers. There are no present users of such services.

"... the specific stereophonic sound transmission standards which would be appropriate for a reduced channel bandwidth, including pilot tone, L/R subcarrier, highest modulating frequency, and maximum signal deviation."

Again, LPFM stations should enjoy the same full carrier, but at lower power levels.

"57. ... we tentatively conclude that strict local and cross-ownership restrictions would be appropriate for the low power radio service."

I strongly believe that the Commission's proposals in this regard constitute a minimum standard. I believe that the Commission will be surprised at the creativity of the efforts to circumvent the intent of these proposed regulations.

"58. We seek comment on whether the proposed cross-ownership restriction will unnecessarily prevent individuals and entities with valuable broadcast experience from contributing to the success of the service, or whether it is necessary to keep the service from being compromised or subsumed by existing stakeholders."

In today's consolidated environment, only a handful of those experienced industry persons are the owners of stations. The vast majority are deejays, technicians, and so forth, people who today have no hope to own a radio station, and because they are not owners, they would not suffer any form of discrimination by any of the proposed ownership restrictions. It is extremely important to structure LPFM such that it does not become corrupted by the forces that have consolidated today's radio environment.

"59. ... Congress's intent, to enhance commercial efficiencies in the radio broadcast industry, does not sufficiently apply to the new classes of service we are contemplating."

I agree with the Commissions reasoning that this would be a separate class of FM broadcasting. I would also add that it would take a long time for LPFM to lapse into the dreadful formulaic structure that grips the current FM broadcasting industry, which itself took more than two decades to devolve into homogeneity.

"60. ... we do not see at this time a need to restrict as severely the number of LPFM (or microradio) stations an individual person or entity may own nationally. As with full power stations, we expect that economies of scale would allow licensees to improve their service..."

I believe that the need for a true "service" is greater than the need for the "economies of scale" which is itself the anti-thesis of diversity. I fear that to allow for the immediate consolidation of LPFM would soon lead to speculative applications, the inability of normal persons to obtain licenses, and would generally doom LPFM to the same sort of "more of the same" programming that we see today with conventional FM broadcasting, which has not caused the "licensees to improve their service."

"... because competition and diversity have a greater impact on viewers on a local level than on a national scale, we tentatively believe that these national efficiencies would likely outweigh the competition and diversity costs to viewers."

The sentence above reads like a parable on supply-side "voodoo" economics. We have a choice; we can either accept the mediocrity that comes with "national efficiencies," or we can strive for local competition and diversity. Conventional FM broadcasting is already plagued by these "national efficiencies," therefore, I believe that it would be prudent to allow for a locally owned and operated LPFM service that serves the public interest. All members of the Commission are well aware of what happens when a local "Mom and Pop" sells out to a big, distant corporation.

"61. ... Although urged on us by many commenters, we do not propose to establish a local residency or an "integration" requirement..."

If LPFM is to be relatively unregulated (no ownership restrictions), then the lack of any residency requirement will ensure its demise at the hands of the powerful corporations that rule the (public) airwaves today.

"... because the service areas for LP1000 stations will be relatively small, a potential new entrant may hold residency in a location where no LP1000 channels can be found, so that we might frustrate one of the significant potentials of LP1000 stations with such a requirement."

Ownership restrictions in the past have addressed this issue by allowing the new entrant to live within a specific radius (e.g. 50 miles) of the proposed station. It should be obvious that this is preferable to the owner being an anonymous corporation three thousand miles away.

"65. ... Unlicensed radio operators not only violate the longstanding statutory prohibition against unlicensed broadcasting and our present rules on unlicensed broadcasting, but they also use equipment of unknown technical integrity."

This current state of affairs is one of many justifications for this NPRM. Should the NPRM be properly implemented, there will exist no need for today's unlicensed broadcast stations. It has been said that the huge number of these stations has forced the hand of the Commission into creating this NPRM. While I believe that the current Chairman is behaving responsibly by attempting to correct past wrongs, it is true that there is a need for change, and if implemented properly, many of today's perceived problems would disappear.

"66. ... some unlicensed broadcasters have persisted in their unlawful activity."

While this is true, it is interesting to note that on the internet and other places, many potential licensed broadcasters are taking a "wait and see" attitude, hopeful that the current inequities will be addressed by the successful implementation of this NPRM.

"67. ... the Commission is rightfully concerned with 'misconduct which

demonstrates the proclivity of an applicant or licensee to deal truthfully with the Commission and to comply with our rules and policies.'"

Many such applicants felt that the current system was unjust, their applications were ignored or refused without rational explanation, and they therefore saw no alternative other than civil disobedience.

"... Parties who persist in unlawful operation after the Commission has taken any of these enforcement actions could be deemed per se unqualified, and we seek comment as to the eligibility of such parties for a license in any new radio service."

Using this logic, Rosa Parks would be "unqualified" to ride in the front of the bus due to her prior behavior, and my great-grandmother who drank an occasional alcoholic beverage in the 1920s would have been barred from drinking following the end of the prohibition era. Persons with such resourcefulness who have in the past operated an LPFM broadcast station in good faith should not be further punished for an activity that will become decriminalized (assuming that the NPRM survives the anticipated onslaughts).

"... The reliability as licensees of parties who may have illegally operated for a time but have ceased operation after being advised of an enforcement action, however, is not necessarily as suspect. We seek comment on the propriety of accepting as licensees of low power (or microradio) licenses parties who may have broadcast illegally but have promptly ceased operation when advised by the Commission to do so, or who voluntarily cease operations within ten days of the publication of the summary of this Notice in the Federal Register."

Many of today's unlicensed broadcasters would be excellent station operators should the NPRM be successful, and their entrance into the LPFM market should not be impeded. Many such persons have voluntarily ceased broadcasting in anticipation of the results of the NPRM, despite the delays in the process created by the NAB and other hostile parties. It should be noted that many of these same parties will resume their operations should the Commission fail in its duty to restore fair and equal access to the airwaves.

"68. ... We seek comment on whether to impose a minimum local origination requirement on any of the three proposed classes of LPFM service..."

"... we are inclined to give low power (and microradio) licensees the same discretion as full- power licensees to determine what mix of local and nonlocal programming will best serve the community."

If the Commission desires to have LPFM be a useful medium and if the Commission desires to thwart those who would immediately move to have a consolidated and corporate LPFM industry, local ownership rules shall be implemented, augmented by some level of local origination requirements.

"... in order to promote new broadcast voices, we propose that an LPFM station not be permitted to operate as a translator..."

The Commission's statement barring the LPFM station that functions as a translator needs some clarification. For example, the Commission should be clear whether or not the LPFM station is allowed to repeat the offerings of other LPFM stations, satellite transponders, internet streams, and so forth. In order to allow for diverse programming from a single individual, the Commission might consider authorizing the LPFM station to rebroadcast material from other sources for a limited number of hours per week. Restrictions must be firm enough to preclude the creation of networks of LPFM stations.

"69. ... Commenters disagree as to whether low power radio should be limited to noncommercial operation."

If the Commission desired to create an LPFM service that serves the public interest and is inherently resistant to the scourge of consolidation, it will not permit commercial operations including the dreaded underwriting that has made a mess of today's so-called "public radio."

"72. We expect the very nature of LP100 and microradio stations will ensure that they serve the public. Therefore, we are disinclined to put the burdens of complying with specific programming requirements on these licensees, particularly given the size of the operations we envision and the simplicity we are striving for in this service."

While the intent of this statement is noble, the Commission must have a means by which to manage miscreants who find themselves LPFM station operators. For example, an unlicensed station in California's central valley with a remarkable coverage area repeatedly played a single song for several months until its "owner" tired of paying the electricity bill. It would be unjust if such a "station" were to preclude others from operating LPFM stations.

"73. ... We also request comment on whether LPFM stations of each class should be subject to the variety of other rules in Part 73 with which full power stations must comply..."

"... We would be disinclined to apply these service rules to microradio stations, and we particularly seek comment with regard to the rules appropriate for LP100 stations."

While I believe most sections of Part 73 constitute good engineering practice for LPFM, I would like to see a few adjustments. Microradio stations should be given a little more flexibility in their selection of antennas, particularly to allow for omni-directional "gain" antennas. Type acceptance should be strict enough to eliminate the need for a microradio station to have a modulation monitor for three reasons: (1) the cost versus the benefit of said equipment, (2) the inability of the microradio station to create large amounts of interference, and (3) the likelyhood that the microradio station's "engineer" would lack the technical depth to interpret the display of said equipment. Microradio stations should be given more opportunity to operate close to television's channel six where no possibility for interference exists. The determination of operating power should not be an issue; the LPFM operator should use type accepted equipment whose maximum rated output, when multiplied by any antenna gain, simply cannot exceed the allocation. The Commission's station inspections of microradio stations should more closely resemble those of translator stations in order to allow for some unattended operation. EAS requirements should be eased for microradio stations for obvious reasons.

"74. We also propose to treat low power radio stations like full power stations for the purposes of our environmental rules and responsibilities under the National Environmental Protection Act."

It would also be prudent to remind LPFM operators to comply with the new RF exposure guidelines.

"75. We also seek comment on the applicability of the various political programming rules to each class of low power service we might adopt. There are two statutory provisions explicitly underlying some of these rules, and each is explicitly applicable to "broadcasting stations." Thus, we lack the discretion not to apply these provisions to any class of LPFM station, regardless of its size."

It would appear that the Commission's hands are tied in this matter, and should LPFM become reality, its operators may have to appeal to Congress for relief. In this vein, the failure of the ammended (1978) "Fairness Doctrine" must not be repeated. The Commission will have to use other means to ensure that any one group does not become the "spammer of the airwaves" as we have seen with translator stations. Requiring the

stations to be noncommercial and non-profit is merely a start in this endeavor.

"76. ... we propose to require them [LP1000 stations] to maintain the same minimum hours of operation as are required of the lowest class of full-power stations: generally two thirds of their authorized hours between 6 a.m. and midnight."

It is only reasonable to have the LP1000 requirements be similar to those of existing classes duplicated by the LP1000 proposal.

"77. ... a minimum operating schedule [for LP100 stations] should not be established unless and until it is shown to be necessary."

I believe that it is wise for the Commission to have a "hands-off" approach on such issues in cases where it would not be difficult to make changes at a later date. This is clearly one such issue whereas the needed ownership restrictions are not something that can easily changed at a later date.

"79. ... The Community Radio Coalition also contends that low power (or microradio) construction permits should not be transferable, in order to discourage trafficking in construction permits and speculative applications."

I strongly agree that the trafficking of large numbers of construction permits and can only see exceptions under unusual circumstances such as the death of its owner. I would hope that the permits would not be transferable, but that a waiver could be used upon rare occasion.

I have received two e-mails, one from each coast, from persons working at large FM broadcast stations. These people inform me that their stations have already talked to their employees about the LPFM NPRM, and, anticipating the ability to transfer, will have each and every one of their employees submit their own application should LPFM become a reality. One of these stations has more than fifty employees! The Commission must strive to thwart all such abuses of this process.

"80. ... We believe that LP100 and microradio stations should be able to be constructed in much less time and propose an eighteen-month construction limit for LP100 stations and a twelve-month limit for microradio stations."

The Commission's proposed time limits for construction permits are more than generous. If an applicant is unable to construct a station within twelve months, they lack the focus needed for such an endeavor.

"82. ... we query how often and how closely we should actively monitor their [LP100 and micro] performance, within the parameters of our statutory responsibility."

The determination of the level of oversight of LPFM should certainly fulfill statutory responsibility, but nevertheless, it is an inappropriate topic for an NPRM. Such matters are the responsibility of the Commission itself, and are subject to a variety of conditions such as observed behaviour in the field, budgetary resources, and available manpower, to name a few.

"... Would a pro forma process satisfy any statutory requirement, in the absence of specific public complaint, for the new classes of stations contemplated here?"

Again, this is not an appropriate topic for an NPRM, and the existing FM broadcast rules should be used as a template for LPFM.

"83. ... we are open to comment on whether stations in other classes should be authorized for finite non-renewable periods, such as five or

eight years, so that others may eventually take their turns at the microphone."

This is an issue that should be taken seriously. It is difficult to come to a judgement because one can only make guesses about the popularity of such a radio service. If the Commission can realistically control the number of licensees by allowing only noncommercial entities and by using other controls, it could be unneccessary to limit the duration of the authorization. In any event, I believe that the license should be renewable in cases where its re-authorization due not preclude the authorization of a new station of the same or greater class.

"84. We also seek comment on whether a finite, nonrenewable license period for LP100 or microradio stations would contravene Congress' intention in adopting statutory provisions that provide for a "renewal expectancy" for broadcast stations."

Although I am not able to address the issue of Congress' intent, the public interest is served by continuity wherever possible. Should the Commission decide to forgo a "renewal expectancy," it should then grant stations the right to transfer their license to another upon its expiration.

"85. A similar issue is raised with Section 307(c) of the Act, which states that each broadcast license shall be granted "for a term not to exceed 8 years. Upon application therefor, a renewal of such license may be granted . . . if the Commission finds that the public interest, convenience, and necessity would be served thereby." 47 U.S.C. 307(c).

It would appear that if the station has been serving the public interest, it is the intent of the Communications Act to provide a renewal expectancy.

"86. Given the ownership restrictions proposed here, we do not believe it is necessary or appropriate to restrict the sale of any class of microradio station, as urged by some commenters. These parties are concerned that service will be delayed by speculative applications and trafficking in construction permits."

As stated earlier, the ownership restrictions as sought by the Commission contain loopholes, and more such loopholes will undoubtedly be found. This will pave the way for a speculative market in which those without industry knowledge and connections will miss out on this opportunity. Should the Commission desire a democratic process, these issues must be addressed in order to avoid a scenario in which elite interests capture all of the available LPFM licenses, and the person with a desire to serve the community is left with no alternative but to resume unlicensed broadcasting. Without adding the appropriate controls to the proposal, there will undoubtedly be an undesireable level of trafficking in construction permits.

"87. ... Since we expect LP1000 facilities to reach a significant number of people, we propose to treat them like full power FM stations for the purposes of the Emergency Alert System (EAS)."

As EAS has become simpler, it is reasonable to require its installation by LP1000 stations.

"... We also request commenters to address how LP100 stations, with their intermediate size and audience reach, should fit into the EAS structure."

EAS for LP100 stations could be phased in over time. It could be argued that this is more important in a rural area in which the LP100 station is the primary source of information for those within its coverage area.

"89. ... As with full power broadcast stations, all LPFM stations would be made available for inspection by Commission representatives at any

time during their business hours or at any time they are in operation."

There exist some low power FM broadcast stations (some Part 15 compliant, some not) that use a personal computer for the purposes of unattended operation. A twenty gigabyte hard disk drive is now less than three hundred dollars, and that volume of space is enough to store two weeks of continuous MPEG-3 audio programming, enabling one to have an extensive playlist. Although this technology has become inexpensive and reliable, problems can and do happen, and the Commission must address these issues.

I would like to see microradio stations have the authorization for unattended operation. Many such stations will literally be staffed by one person who is unable to be present full-time, and may wish to provide their neighborhood with pre-recorded material during his or her off hours. Should such operations be permitted, the Commission must have some form of non-intrusive shutdown access in the event of a malfunction.

"90. ... We seek comment on whether similar [translator shutdown] provisions should apply to LP100 and microradio stations if authorized as secondary services."

Should the Commission authorize unattended operation, there will be an obvious need for a shutdown mechanism, regardless of the station's size. It would be prudent for any type acceptance regulations to provide the "hooks" for such features in order to ensure easy compliance.

"91. We are proposing to require that LPFM and microradio applications be filed electronically."

"95. ... Accordingly, we propose to develop an electronic filing system for LPFM (and microradio) whereby applicants would submit their applications by e-mail."

"... Moreover, the filing system could also be designed to assist applicants in determining HAAT or appropriate derating of permissible transmit power."

Electronic filing has worked extremely well for other services by simplifying and speeding the process, and by saving the Commission resources as well. Filing windows are easier to manage, and applicants soon know their status. As contouring software becomes more available, such features could be included in the process.

"101. ... If ... mutual exclusivity is resolved by auction (a possibility that is discussed below), many of the primary beneficiaries of the new low power radio service might not be able to afford a station."

The use of auctions to resolve mutual exclusivity would guaranty the failure of the intent of this NPRM. I realise that it is not the intent of the Commission to give the airwaves to the most wealthy parties, but that this sorry state of affairs was forced upon us by yet another Congressional blunder, the Balanced Budget Act of 1997. Fortunately, there exists an exemption for noncommercial operations; yet another reason why the LPFM service must be noncommercial in order to be successful. A true lottery appears to be the only acceptable alternative, but with some caveats as mentioned below.

"103. Resolving Mutually Exclusive Applications. Both petitions for rule making propose the use of lotteries to resolve mutual exclusivity among applications, with Skinner specifically referring to the lottery method previously used to award low power television licenses."

"... Many other commenters, especially individuals from outside the industry, oppose the use of auctions to resolve mutually exclusive applications and agree with petitioners' lottery advocacy or suggest methods to reduce the occurrence of mutually exclusive applications, such as a letter-perfect application standard or first-come processing."

While the lottery is far preferable to an auction, it too can be thwarted. For example, the radio station that has each of its fifty employees submit applications within the same window as two other applicants is almost certain to prevail. A letter-perfect application standard would discriminate against those for whom English is a second language, a community that is already underserved. The Commission must ensure the existence of a truly democratic process.

"... Opponents of the low power radio petitions assert that the Balanced Budget Act of 1997 appears to mandate auctions if we must resolve mutually exclusive applications for microbroadcasting."

As mentioned above, this mandate does not apply to noncommercial operations. The Act does not appear to address a scenario in which a commercial and a noncommercial party compete for the same offering. Should the Commission tolerate commercial operators in the LPFM service, I would hope that to ensure fairness in such an event, the parties would be subject to a lottery.

"105. ... Commenters are welcome to address whether these low power and microradio stations could be excluded from the auctions requirement of Section 309(j) consistent with legislative intent, and what other method we have the legal authority to use to resolve mutual exclusivity when it arises."

"106. ... we have an obligation under the Act to explore other means to avoid mutual exclusivity prior to ordering competitive bidding for the LPFM licenses."

The concept of an auction is a gross violation of the spirit of LPFM. It would appear that Congress has done almost everything in its power to milk this public trust for huge amounts of cash, and it is the responsibility of the Commission to ensure that some portion of the broadcast airwaves are accessible by We, the People.

"APPENDIX A FM Radio Service Areas and Interference Protection Criteria"

"1. The current FM Broadcast Service consists of seven classes of licensed stations, Classes A, B1, B, C3, C2, C1, and C. (An eighth class, Class D, was discontinued in 1980, although applications for renewal and modification of these existing licenses are still accepted). "

It is my hope that this NPRM will result in the restoration of what Americans once enjoyed: the Class D FM broadcast service.

"APPENDIX C"

"5. ... The NAB's diagrammatic representations of second-adjacent signal magnitudes and spacings clearly indicate that the most important second-adjacent channel interference consideration would involve IBOC-to-IBOC interference..."

There is currently no installed base of IBOC receivers, thus we can be assured that they will all use modern technology. It is with interest that I note no mention within this NPRM of microradio (or LP100, or LP1000) stations being authorized for IBOC (or other digital) emissions, and I would like the Commission to address this issue.

"January 28, 1999 Statement of Commissioner Susan Ness"

"... To me, there are three issues that will be in the forefront as we build a record: first, whether these services should be open only to

noncommercial entities; second, whether and to what extent these services would adversely affect the potential transition of existing broadcasters from analog to digital through an "In Band On Channel" (IBOC) system; and third, whether the proposed services would create undue levels of interference to full power services."

There is no valid technical reason for worry about the transition to IBOC in the presence of microradio stations, just as most of us don't worry about the ants on the road when we drive our automobiles. The existing full power stations are a thousand times more powerful, and the IBOC receivers will incorporate twenty-first century technologies for ensuring their selectivity. The DSP-based IF strips (also known as "software radios") now becoming available are truly impressive in this regard. In other radio services in which digital and analog signals have shared the same spectrum for years, weak analog signals do nothing to degrade the ultimate content of the digital signals.

"... Before I am to conclude that one or more new services are feasible, I must be satisfied that the technical issues have been adequately addressed. There are real questions regarding potential adverse effects on IBOC digital service and interference protections, particularly with respect to second adjacent channels."

I would like to be coy and suggest that the good Commissioner spend some time in the lab, but I refrain as she is well aware that the strongest opposition to LPFM are the corporate interests whose affiliates fear competition to their centrally created, hollow programming, even though the proposed stations might have less than one percent of the coverage area as their mediocre Goliaths. If the Commission is unsure about this issue (unlike the writers in the engineering trade journals), perhaps the Commission should perform its own study before concluding its rule making.

"January 28, 1998 SEPARATE STATEMENT OF COMMISSIONER MICHAEL K. POWELL"

"... First, I urge the parties to develop a full, objective record regarding potential interference problems that might result from creation of these new classes. One very important purpose of this agency is to ensure efficient and effective use of the radio spectrum."

And I would like to applaud those within the Commission who understand that an LPFM service would "fill in the gaps" and thus make more "efficient and effective use of the radio spectrum."

"... I intend to consider interference questions very seriously before taking final action. My second concern relates to the impact that creation of low power service may have on potential conversion to terrestrial digital radio service."

Again, weak signals (analog or digital) do nothing to effect the bit error rate of a strong digital signal.

"January 28, 1999 DISSENTING STATEMENT OF COMMISSIONER HAROLD W. FURCHTGOTT-ROTH"

"... I am not opposed to the creation of a low power radio service."

A good start by the Commissioner who has a few insightful thoughts, as well as a some ideas that are either very sophomoric, or are the result of listening to the opponents oft repeated predictions of mayhem.

"... these ownership limits would help to ensure that no one with any actual experience in broadcasting could actively participate in these new stations."

There is no such specific limitation contained in the NPRM. There are

many persons in the industry who are fed up with today's consolidated broadcasting industry and would be enthusiastic contributors to LPFM.

"... plans for the delivery of this service have been based on current interference standards, and it is unclear whether these plans can be successfully modified should those standards change."

I suggest taking a look at the existing grandfathered short spaced stations for experience in this matter. It is clear that they have made very good use of the spectrum.

"... "community participation and the proliferation of local voices," supra at para. 2, can be achieved through a variety of ways other than the creation of microradio. People can communicate with others by obtaining extant commercial or noncommercial licenses, the purchase of air time on broadcast properties, leased access and/or PEG cable schemes, amateur radio, e- mail, internet home pages, bulletins and flyers, and even plain old-fashioned speech."

It is hard to believe that this statement was made by a Commissioner (I am assuming that this text is not the result of a hack on the Commission's web site). Few individuals (including the Commissioners) could afford the purchase of an existing license. A microradio station could be created and run "24 by 7" for the cost of an hour on an existing broadcast station. I am surprised that the Commissioner is unaware that amateur radio operators are specifically excluded from broadcasting within their frequency allocations, in fact, the Commission has recently issued NALs to some individuals for very offense. The internet and e-mail are hardly ubiquituous and are available to few mobile users. One can only speculate how many bulletins and flyers the Commissioner reads during his commute to work.

If these other means are viable alternatives, I encourage the Commissioner to suggest to the NAB that they cease their use of the FM broadcast spectrum and focus on these other methods of distribution.

"... Commission enforcement of rules and regulations applicable to the new stations will be an administrative drain and involve the Commission in micromangement of the smallest of operations."

I have never seen an NPRM for a new radio service in which a negative commenter did not put forth this reasoning. Fortunately, wiser minds have acknowledged that the duty of the Commission is to determine the viability of, and to set the standards for the new service, and not to moan and groan about the costs of oversight. It should be noted that the administration of many radio services has been privatized, resulting in a more democratic allocation process while easing the strain on the Commission, and this possibility exists for LPFM.

"... Good -- arguably better, even -- alternatives for the dissemination of messages in America certainly exist. And the administrative burdens on the Commission will likely be great. Accordingly, I do not think this proposal represents an efficient use of radio spectrum. In addition, I do not view concern about the effects of consolidation in the radio industry as the result of the 1996 Telecommunications Act as an appropriate motivation for the creation of low power radio stations."

The Commissioner fails to explain how "filling in the gaps" is not making more efficient use of the radio spectrum. I am quite surprised at his cold-shouldered remark about the damage done to the broadcast spectrum by our Congress in 1996. Such a statement could make one question whose interest the Commissioner is dedicated to serving. And whether one likes it or not, one of the roles of the Commission is to navigate us around the mess caused by a technologically inept Congress.

"... I wonder whether the "substantial interest in, and public support for," supra at para. 1, this rulemaking, relied upon so heavily in this

item, was not partly generated by the Commission itself with its web site page for low power radio."

Said web page has a hit counter which reveals that few persons have visited the page. I would speculate that most of the visitors to the page already had their mind made up on this issue and were merely checking up on the Commission's "party line."

"... we should not use government funds to promote a particular result prior to even the issuance of an NPRM. Not only does such promotion damage our impartiality, but it puts private interest groups on the other side of the issue in the position of having to expend resources to counter not just the efforts of opposing parties but of the agency as well."

On this issue I strongly agree with the Commissioner and commend him for his insight, however inadvertent or unpopular. Although I am pleased to see the Chairman in support of this good cause, that support should not result in legislative activism in any arena, despite the best of intentions. Fortunately, the damage is minimal as the NAB and its public brethren possess the resources to bury the Commission many times over.

"... In short, given the potential harmful effects on current licensees and their listeners, the limited benefits of creating a low power radio service, the burdensome regulations placed on the new stations, the new enforcement duties for the Commission, and the availability of alternatives for communication, I do not believe that the pursuit of this proposal comports with our statutory duty to" make available . . a rapid, efficient, Nation-wide and world-wide wire and radio communication service." 47 USC section 151 (emphasis added)."

The "harmful effects" have been demonstrated to be minimal by the existence of the existing grandfathered short spaced stations as well as by one's good knowledge of engineering. It is highly presumptuous for the Commissioner to speak of "limited benefits" in the context of restoring the democratic process to our access to the airwaves. Let the potential new applicants study the regulations and determine for themselves whether or not to proceed. Our democracy should not be held hostage by a concern about the amount of enforcement duties.

In closing, I am sure that it is obvious that the majority of the parties filing comments opposed to the NPRM are those radio interests who try to hide their fear of competition by repeating one or more of the various NAB mantras that include such strong language as "chaos on the airwaves" and "devastating interference." This would be highly assuming if it weren't for the fact that these parties will use enormous war chests to keep their stranglehold on the airwaves, our precious public trust, and some existing stations are already organizing their employees and associates in an effort to flood the Commission with applications should LPFM become a reality. I urge the Commission to return to the American people a just system as demanded by our Country's democratic principles. In short, just "Do the right thing."

Yours Sincerely,

Mark Walsh (mark@km6xu.com)