

C O R R E C T I O N

In my Reply Comments filed Nov. 4, 1999, the NPRM referred to in the first paragraph was misidentified. The correct Docket number is 99-325. The entire filing should read as follows:

The Commission has, without recognizing it, supplied its own answer to how best to fill the perceived need to have Low-Power FM stations serving local neighborhoods in major cities. In its NPRM on Digital Audio Broadcasting (Docket 99-325, paragraph 41) the Commission asks whether 82-88 MHz should be reallocated for Digital Audio when it is no longer needed for TV Channel 6 after the DTV conversion.

Rather than use this 6 MHz block for Digital Audio (which won't be necessary if IBOC is successful), it could be better used to expand the reserved non-commercial portion of the FM band. This would make it possible to expand public radio broadcasting to under-served geographic regions with full-power stations and provide low-power allocations to serve the local groups in major cities that Chairman Kennard says are most in need of LPFM.

However dubious the Chairman's claim that there are significant population groups in major markets which are under-served by existing radio stations, it would appear to be indisputable that these groups would be better served by stations operating on properly allocated frequencies in an expanded FM band than by jamming in a bunch of new stations which will do little more than increase interference and decrease listening options in the current FM band.

It would be foolish to rush to implement a bad LPFM rulemaking than to wait a few years and implement a plan which might actually have the potential to provide a service to the public.