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May 14, 2003

Secretary Marlene Dortsch, Esq.
Office of the Secretary
Federal Communications Cmsn
445 12th Street, SW
Washington, D.C. 20554

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FCC - MAILROOM

Dear Secretary Dortsch,

This is an informal comment relating to the Federal Communications Commission Notice of Inquiry in Docket 03-65 concerning receiver interference immunity performance.

I believe it is proper for the FCC to enact reasonable and prudent standards to protect broadcasters and consumers from all kinds of interference, especially what is termed by the FCC, "*blanketing interference*".

I also believe the FCC should institute mandatory standards, rather than voluntary "incentives" or mere voluntary guidelines -- the FCC is a regulatory agency, and it has a duty to set reasonable standards after considering the implications of its actions. Every time in the past that a voluntary guideline has been offered -- from AM stereo to FM quad -- marketplace decisions fell back to what makes the biggest profit for the short term, not what's best for the American public in the long term.

Consider the effects on the public when a manufacturer can save a few dollars on the production cost of a piece of electronic consumer gear, and that short-cut design is purchased by someone who lives near a AM, FM, or TV broadcast station: Even if the station is transmitting a perfectly "clean" signal, the station must either bear the cost and burden of "fixing" a poor quality receiver which cannot tolerate the nearby signal of the local broadcaster, or the broadcaster must suffer public relations ill-will and the consumer is left with an appliance that they can't use like they intended.

The consumer doesn't understand that their "bargain" can't handle a strong signal; its brand new -- the TV or radio station must be at fault. Yet the radio or TV station is in full compliance with the technical rules.

There is no reason why a station emitting a clean and pure signal should have the legal or moral burden placed upon it to "repair" a consumer item with inadequate selectivity or which demodulates signals by poor design. It's only a matter of time before bad electronic devices precipitate bad public relation problems with broadcast transmitter issues, and then later with wireless networks and spread-spectrum devices.

There is no reason why those living near an antenna farm should have to put up with a telephone, computer speaker, musical instrument amplifier, a baby monitor, or any other piece of consumer electronics, that unintentionally demodulates a nearby signal. Too many sub-standard products are making their way into the market. The burden of prevention is on

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Too many sub-standard products are making their way into the market.

The burden of prevention is on the manufacturer, not the public or broadcaster.

The burden of creating reasonable standards -- and seeing to it that such is enforced -- is on the Federal Communications Commission.

Today there are no FCC requirements setting minimum performance standards for video or audio consumer equipment -- the responsibility is dumped on either the innocent broadcaster or the unsuspecting consumer -- not the guilty manufacturer.

Both consumer and broadcaster are innocent when a cheap product has "barn door" reception characteristics, but the innocent local station or the unsuspecting consumer still have to figure out how to handle the problem created by an inferior consumer product.

Consumer-grade electronic equipment should work without difficulty in an area near a radio or TV transmitter site with a "clean" signals, and with wireless and spread-spectrum devices which meet minimum emission standards.

Radios should be able to tune to weaker adjacent-channel signals nearby to stronger but clean adjacent station signals and nearby radio stations should not be audible two places on the dial or on TV receivers or hi-fi amplifiers.

There should be minimum sensitivity and selectivity requirements for radios and televisions to preserve and protect broadcasters from this type of interference within their licensed coverage areas *and* in their "secondary" coverage areas.

Standards would protect consumers from the frustration and expense of seeking a fix to a problem that is neither their fault nor under their control.

This is a rare case when a new rule would benefit broadcasters and consumers alike:

Consumers pay good money for receivers and equipment that have an implied warranty of working correctly.

Broadcasters purchase quality transmitters and filters, and work hard to meet and exceed FCC standards for their stations.

This is a case where there does need to be a rule and a standard, and the FCC needs to take action, because as more and more cheap consumer electronics make their way into the United States, the problem and the cost of resolution only grows.

Sincerely,



Deborah S. Proctor, BSEE, CPBE
General Manager, WCPE Radio