

APPENDIX "D"

**LPFM AVAILABILITY
IN METROPOLITAN AREAS**



LPFM in Metro Areas

The potential for LPFM in various metropolitan areas based on REC's LPFM protection proposal and Congressional action that would eliminate mandated restrictions.

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OVERVIEW

For the 2005 filing for MM Docket 99-25, REC has performed a report that looked at every 2 minutes of latitude and longitude across the country as well as metro reports that reviewed every 30 seconds within some top metro areas.

The Every Nook And Cranny (ENAC) report for the entire nation is a separate file. The Metropolitan Area maps are included in this document.

COLOR CODING

The areas in WHITE (no color shading) are areas where LP-100 stations are available today.

The areas in GREEN are those where LP-100 is not available today but will be available if the FCC accepts the REC LPFM protection proposal that includes:

- Elimination of IF protection to domestic stations.
- Protection to only 3,000 legacy local translators.
- Increases in the number of FM Translator sub-classes.
- Changes to how LPTV, Class-A and TV Translators on Channel 6 are protected.

The areas in YELLOW are those areas that would be available for LPFM if the FCC accepts the REC LPFM protection proposal as shown above and if Congress repeals the Radio Broadcast Protection Act and LPFM stations are no longer required to protect the third adjacent channel of domestic FM broadcast stations and FM translators.

The areas in RED are places that no matter what is done, LPFM will not be available in the 88-108 MHz band. To provide LPFM service to these communities, the Commission will need to consider alternate spectrum such as LPAM or reallocating TV Channel 6 to LPFM use.

ANALYSIS

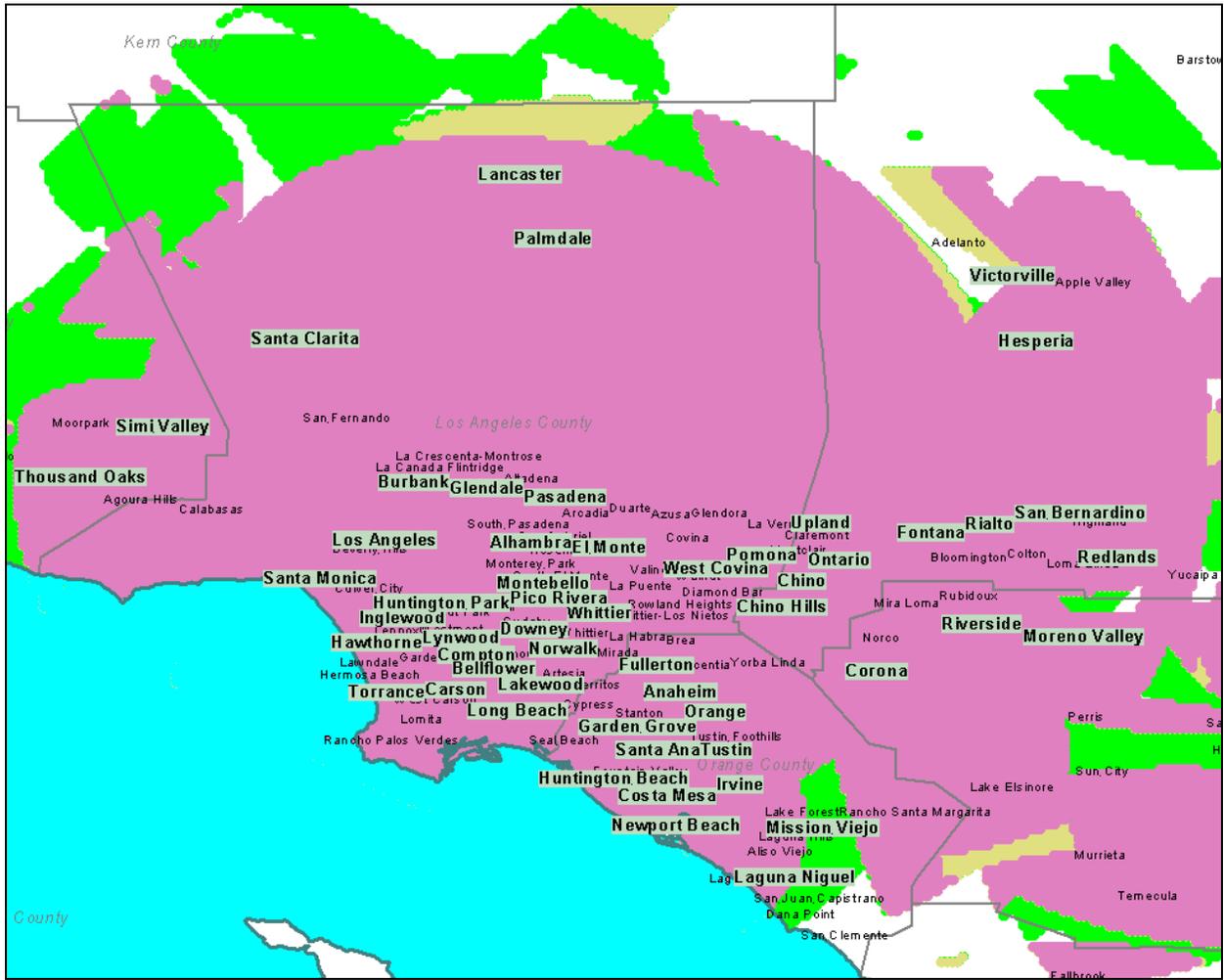
The REC proposal coupled with the Congressional lifting of the third adjacent channel will bring LPFM communities to a few major market communities such as Dallas, Houston, Atlanta and Minneapolis-St. Paul. Many of the metro areas where LPFM is not available are places where FM stations are spaced two channels apart with the major metropolitan area having each allotment every 4 channels including communities such as Los Angeles, New York and Chicago or they are in areas near an international border such as San Diego, Detroit, Buffalo and Seattle.

What we have also found is that in some metro areas where LPFM would be available, the rural areas between two LPFM qualified metro areas are blocked for LPFM due to the protections for the full power stations for both communities overlapping in the rural area. Examples include the areas between Phoenix and Tucson, Denver and Colorado Springs, Kansas City and Topeka, Greensboro and Charlotte, Tampa and Orlando.

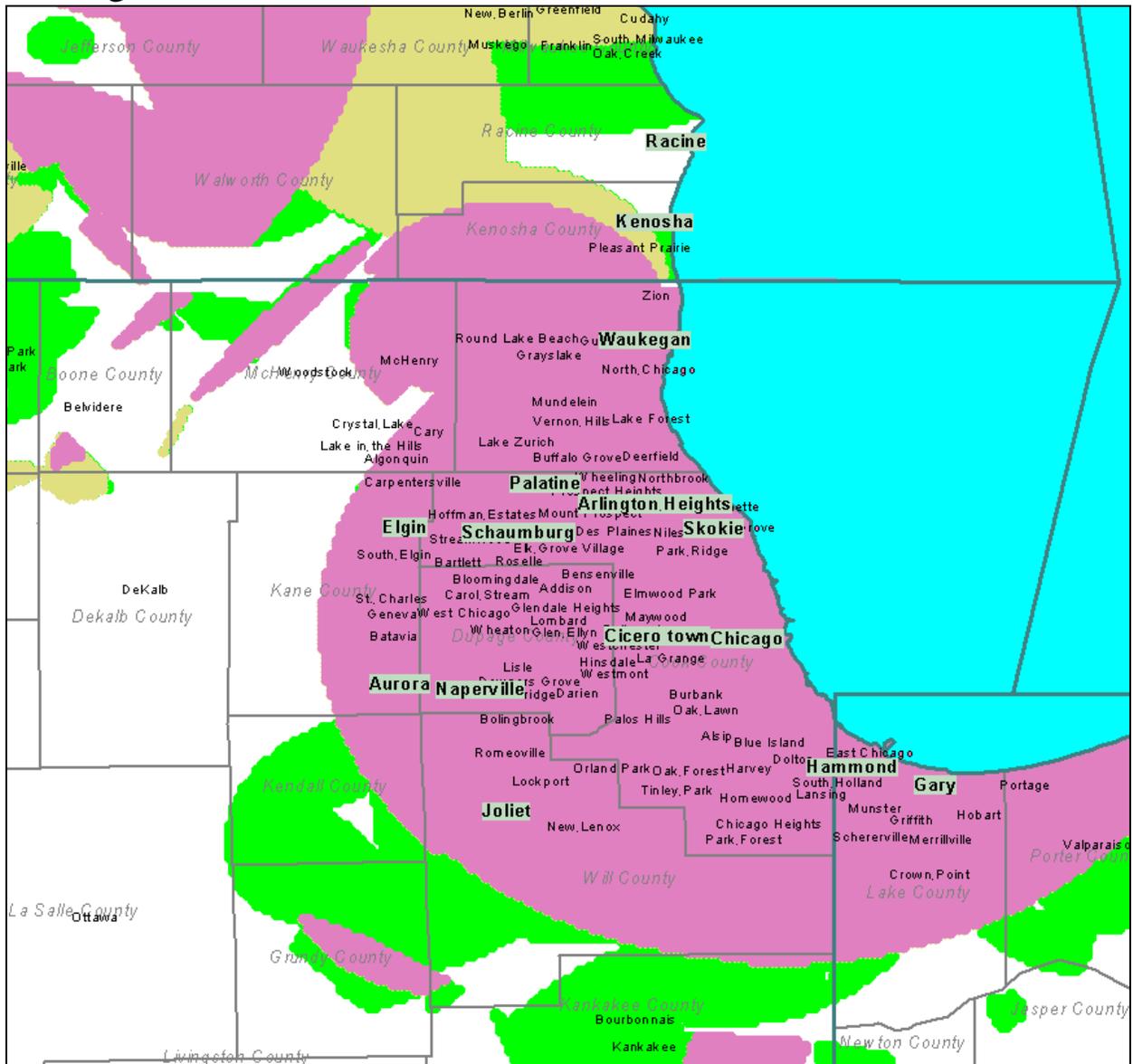
CONCLUSION

REC's proposal will bring extended LPFM opportunities in small and medium size communities that have been denied LPFM in the past due to nearby Channel 6 translators or due to the Great Translator Invasion. If Congress lifts the third-adjacent channel ban, that will open up many more opportunities for LPFM, especially in urbanized areas. Unfortunately, the urban areas will continue to be left out until after the Radio Broadcast Protection Act is repealed and the FCC is allowed to authorize LPFM station applications to use prohibited contour overlap methodology. In addition, LP-10 stations may be able to be placed in some urban areas.

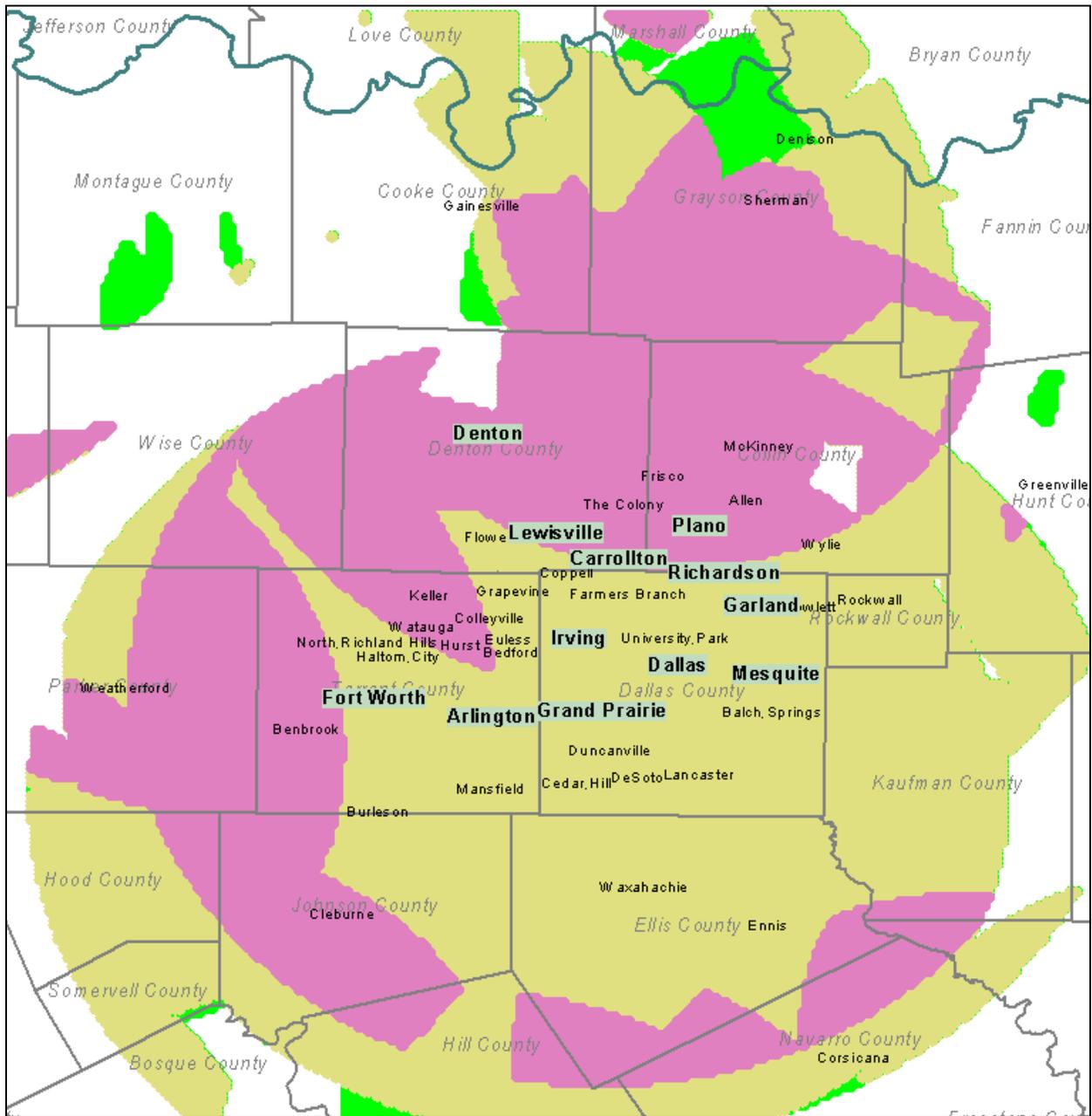
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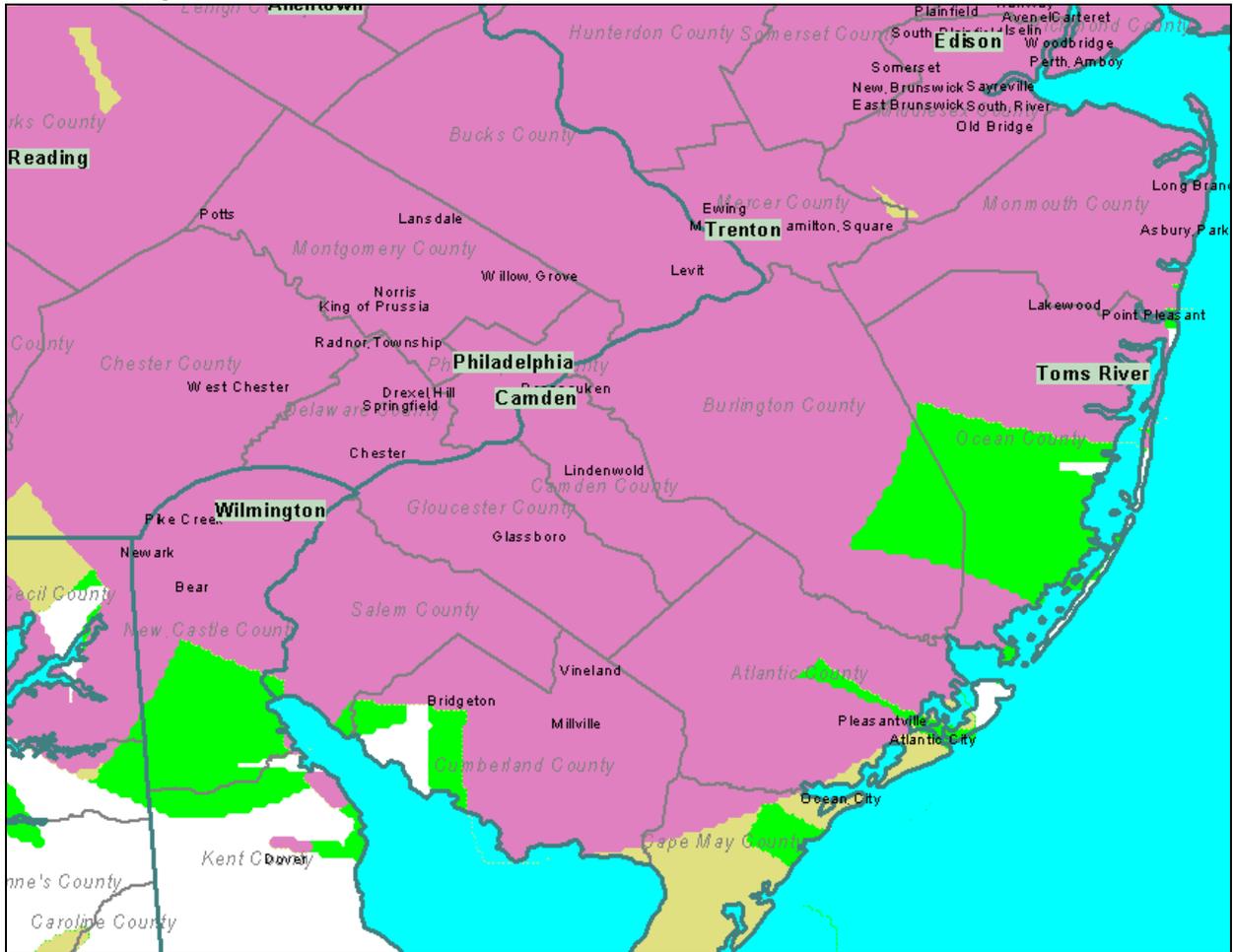
Chicago



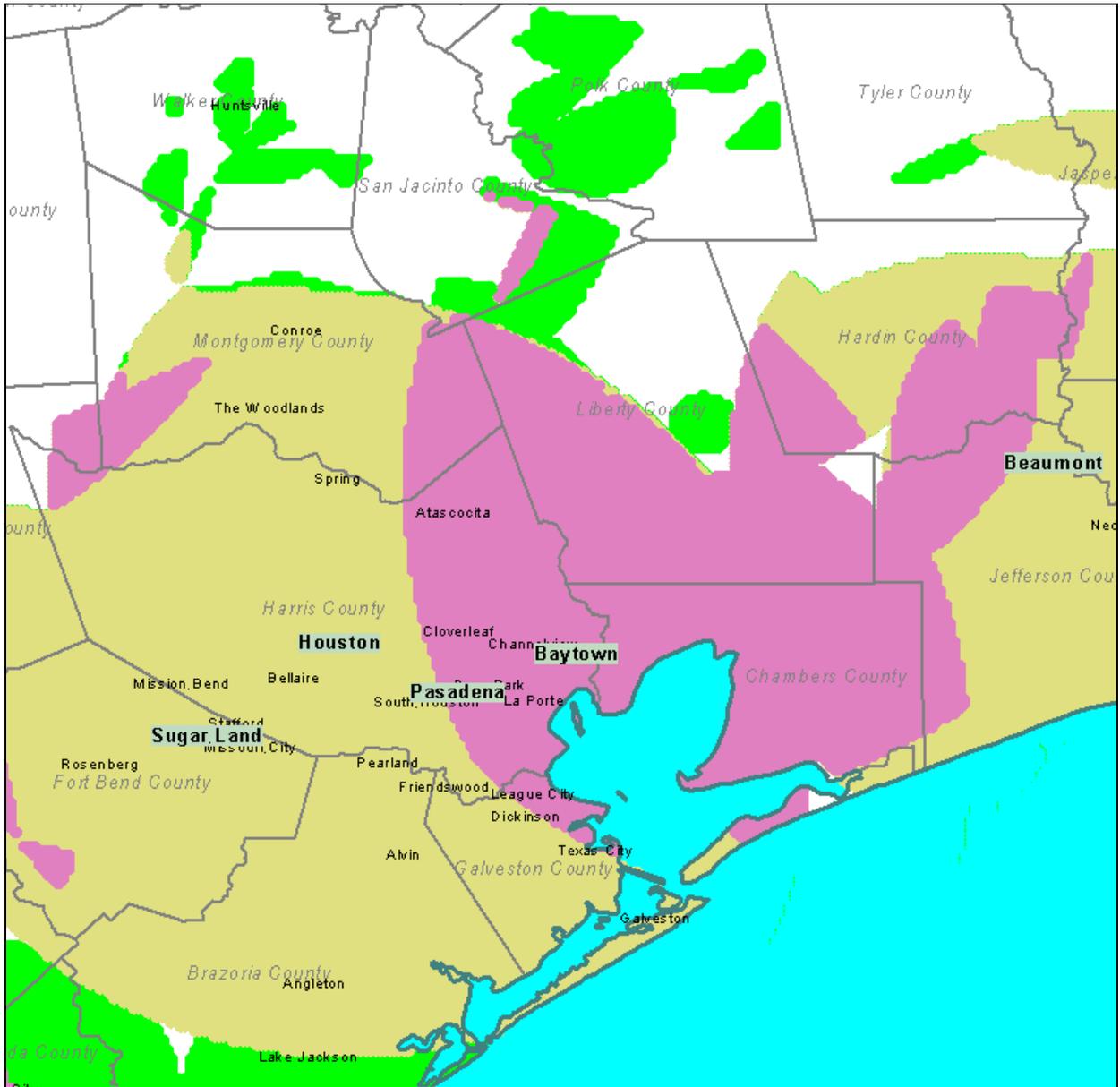
Dallas-Fort Worth



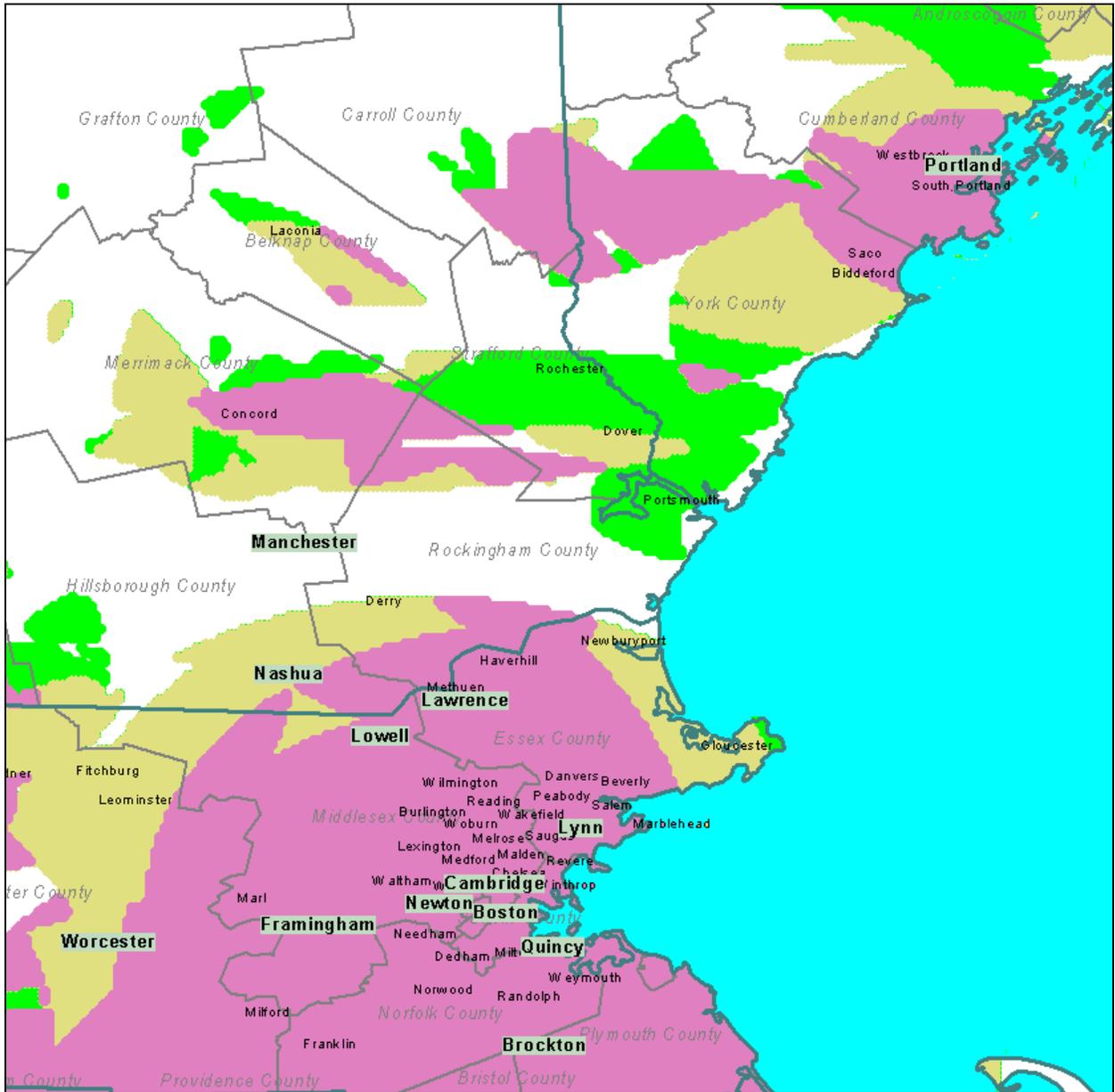
Philadelphia - South Jersey



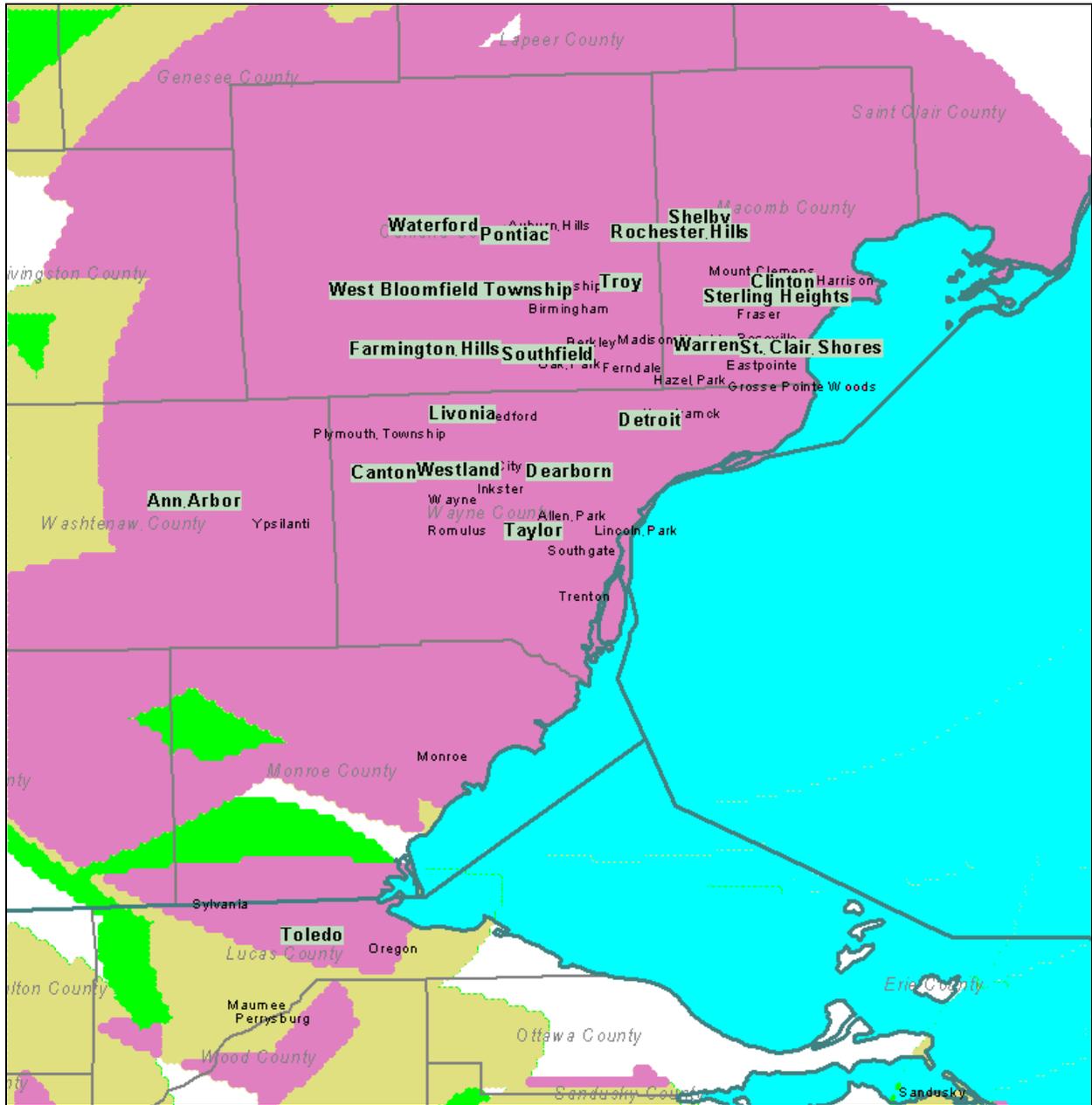
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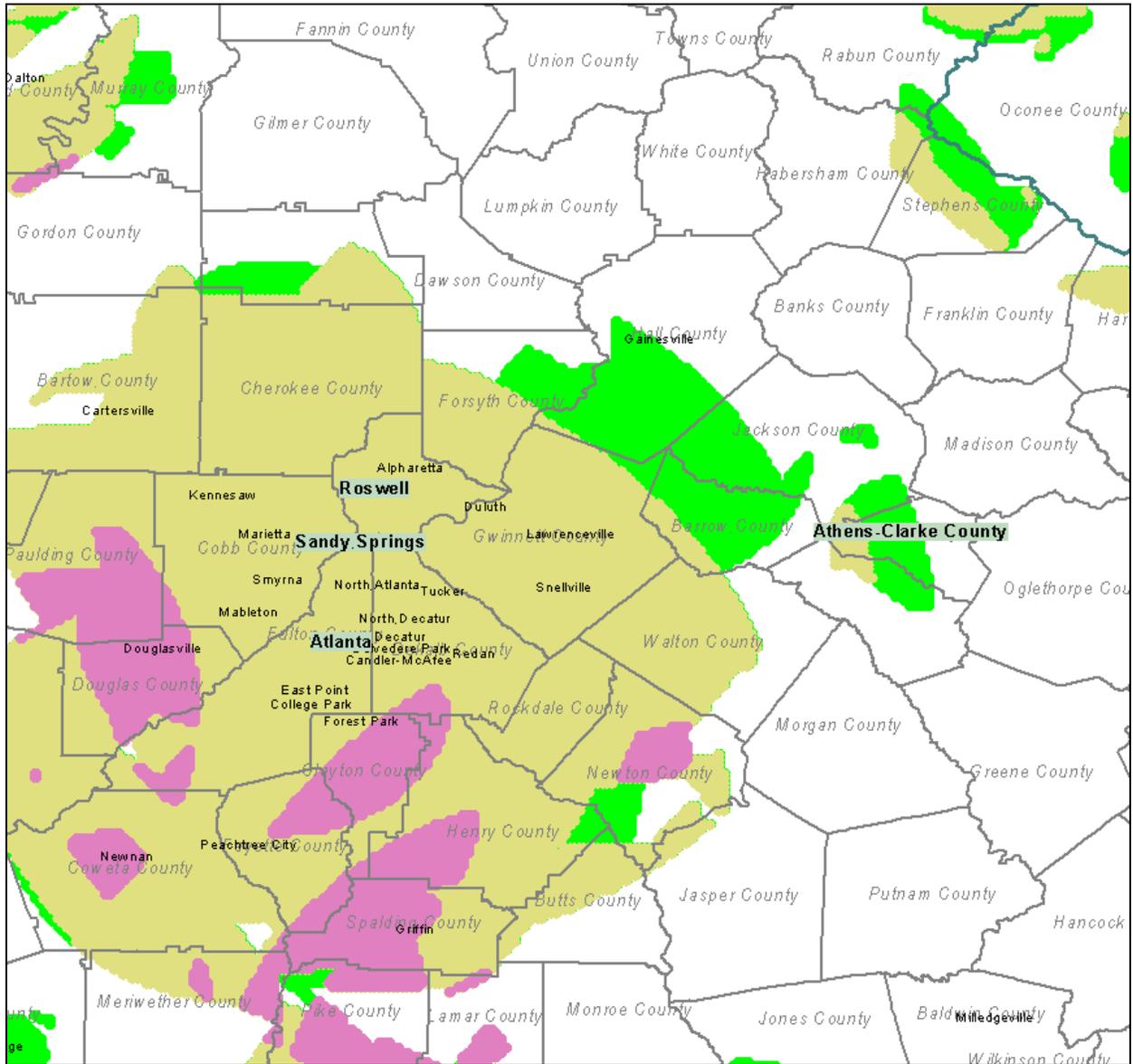
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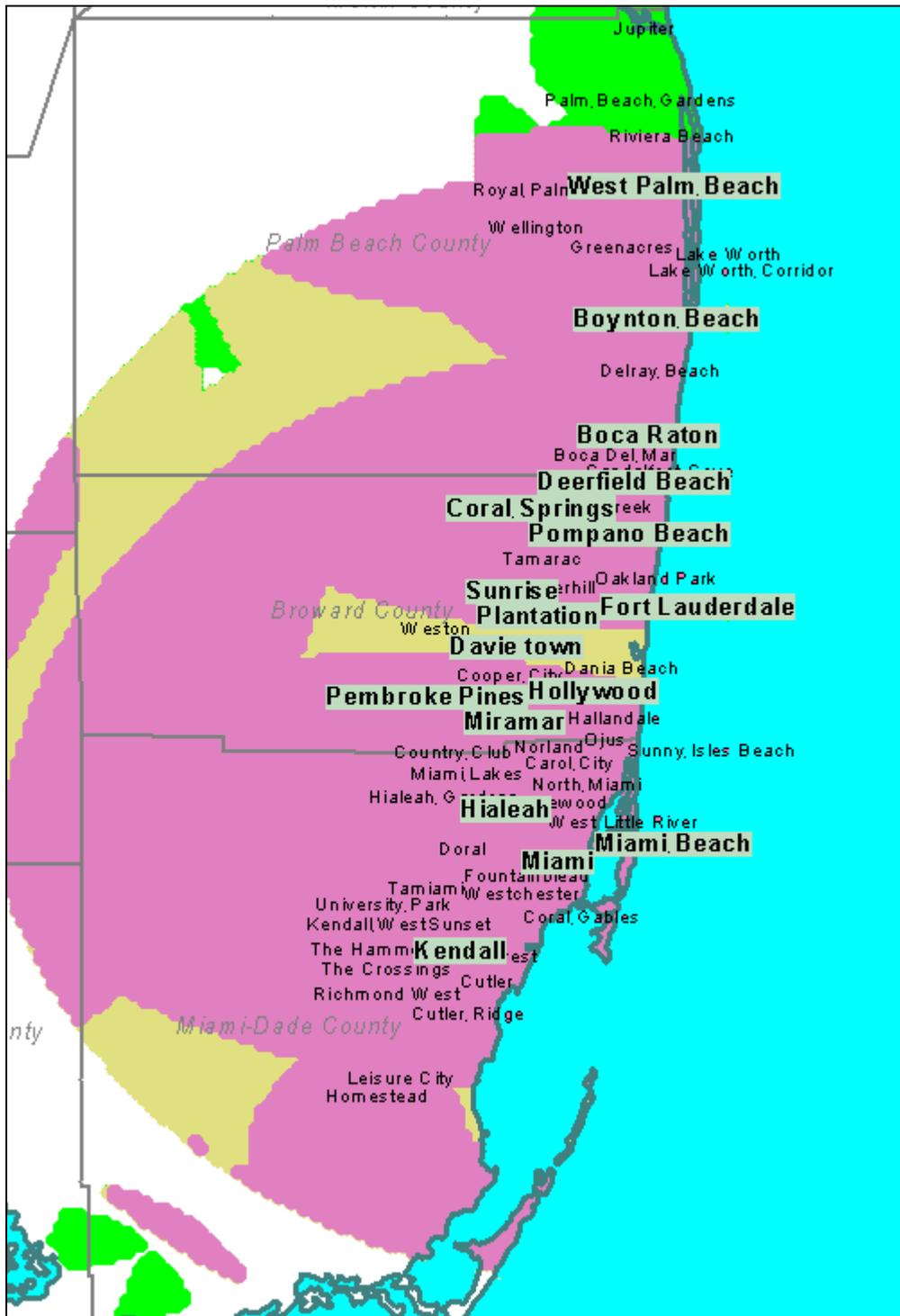
Detroit



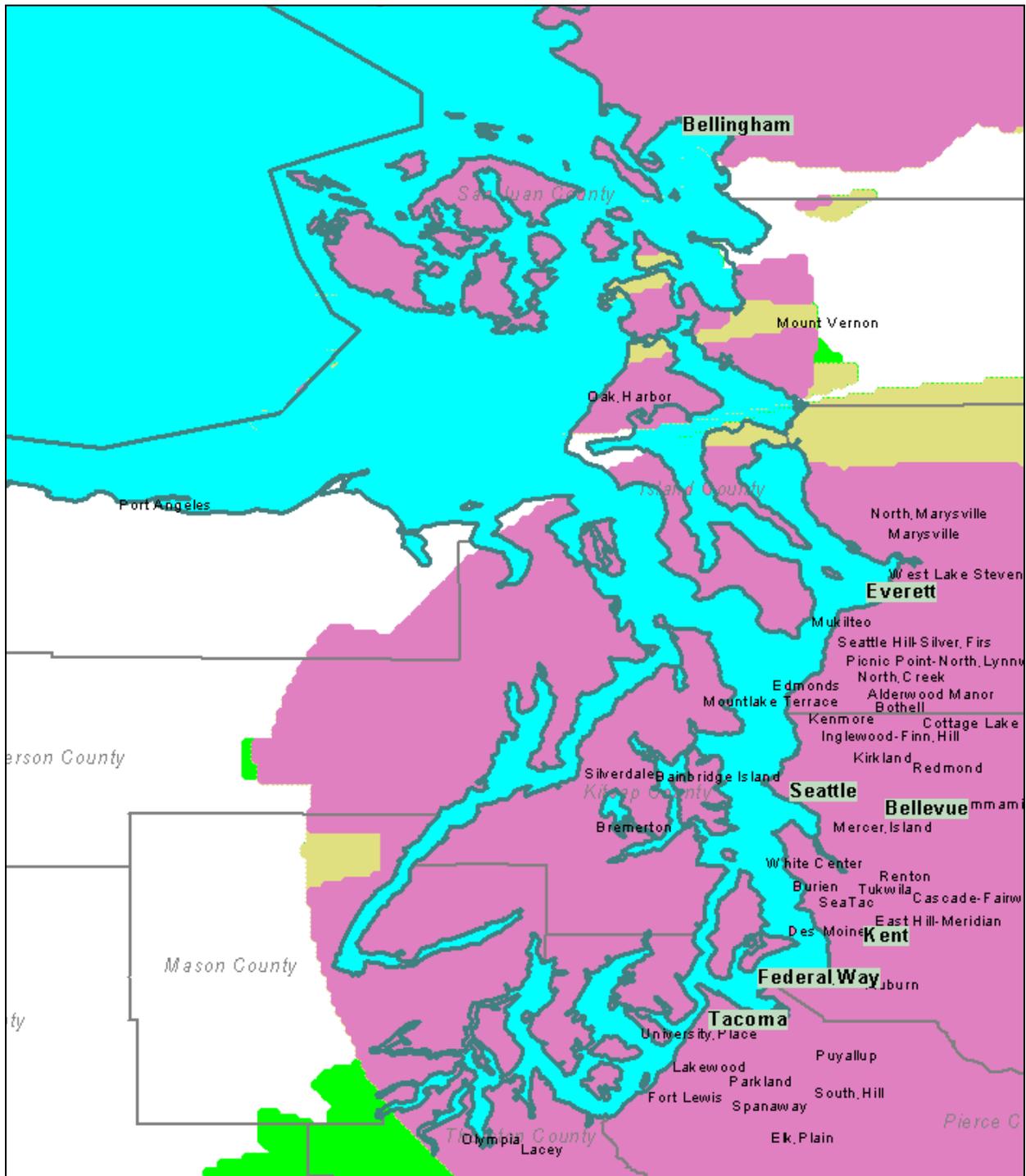
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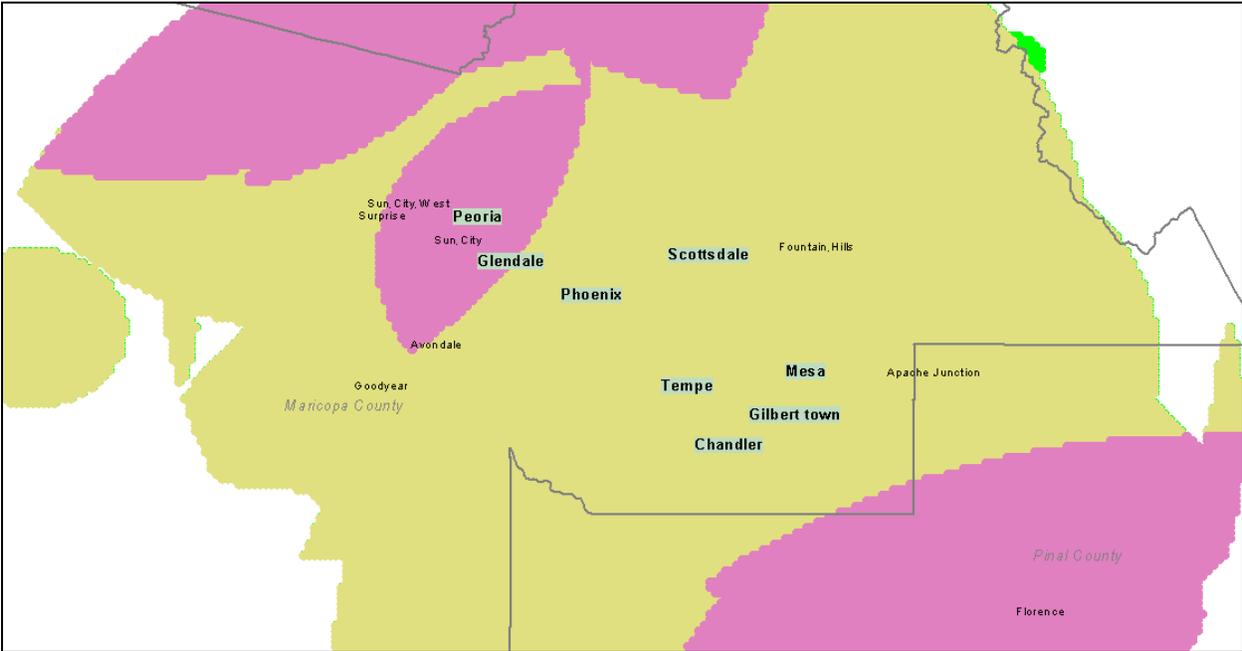
Miami



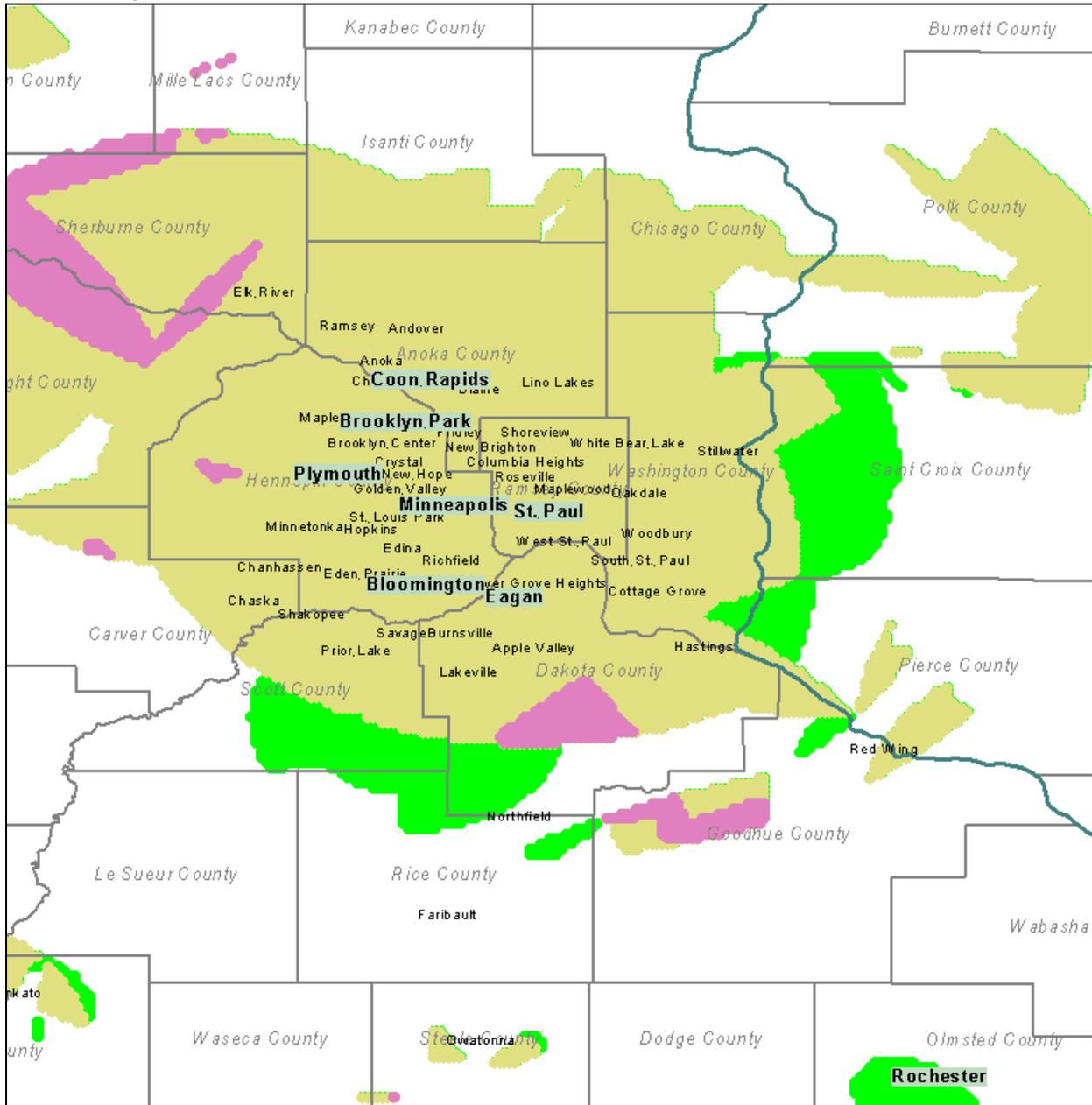
Seattle-Tacoma



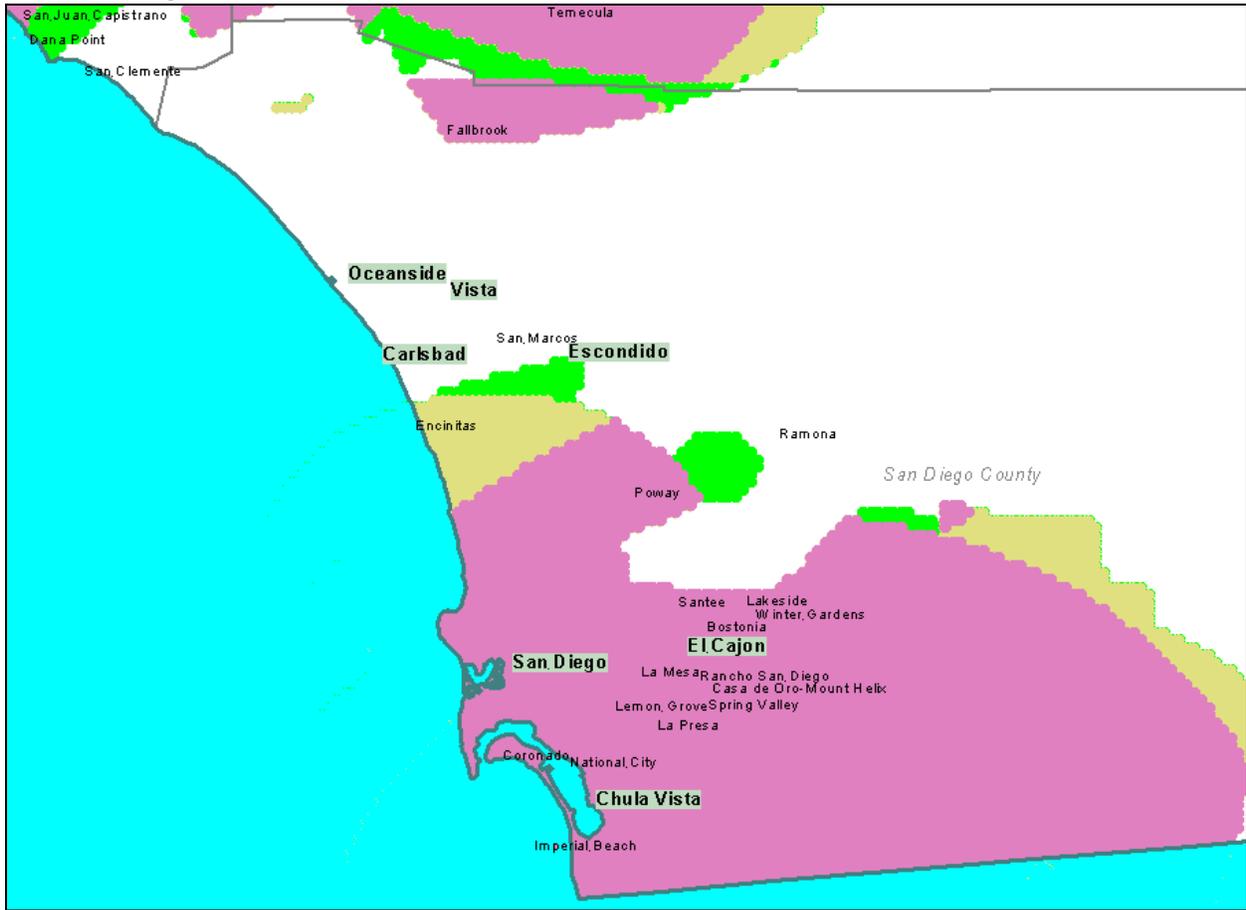
Phoenix



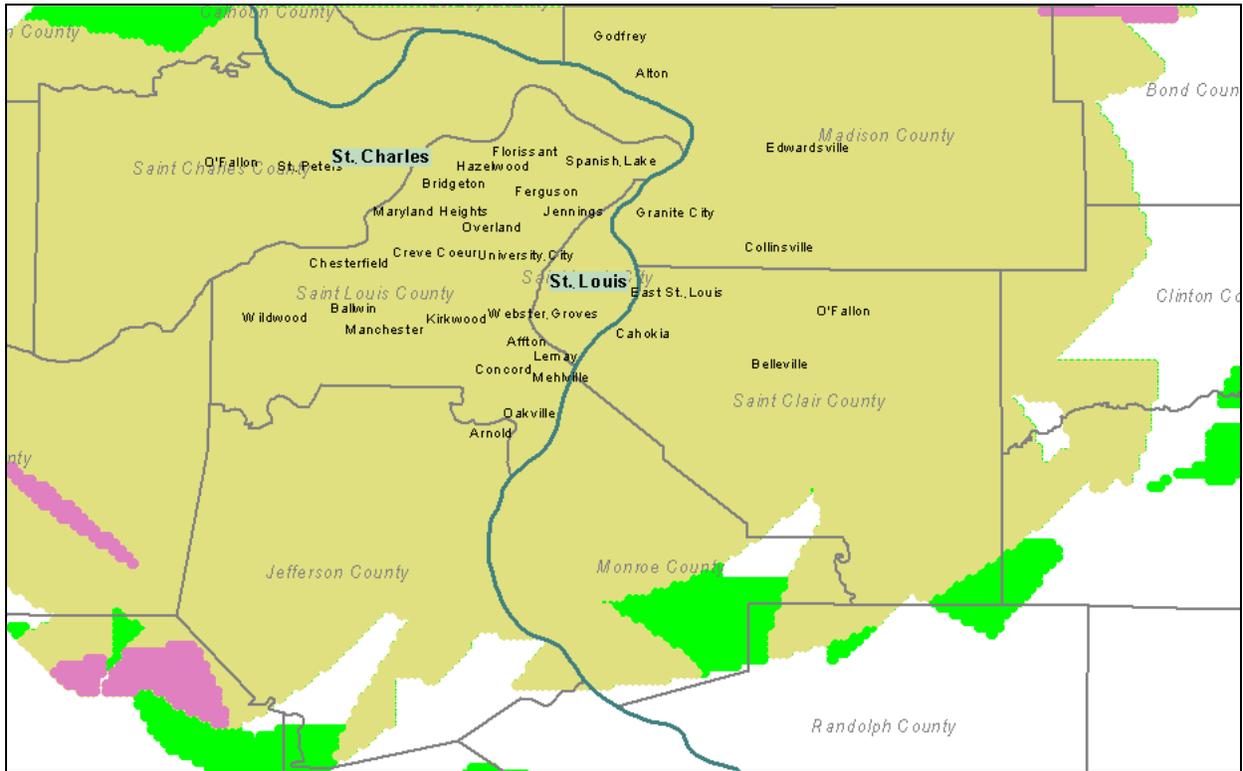
Minneapolis-St. Paul



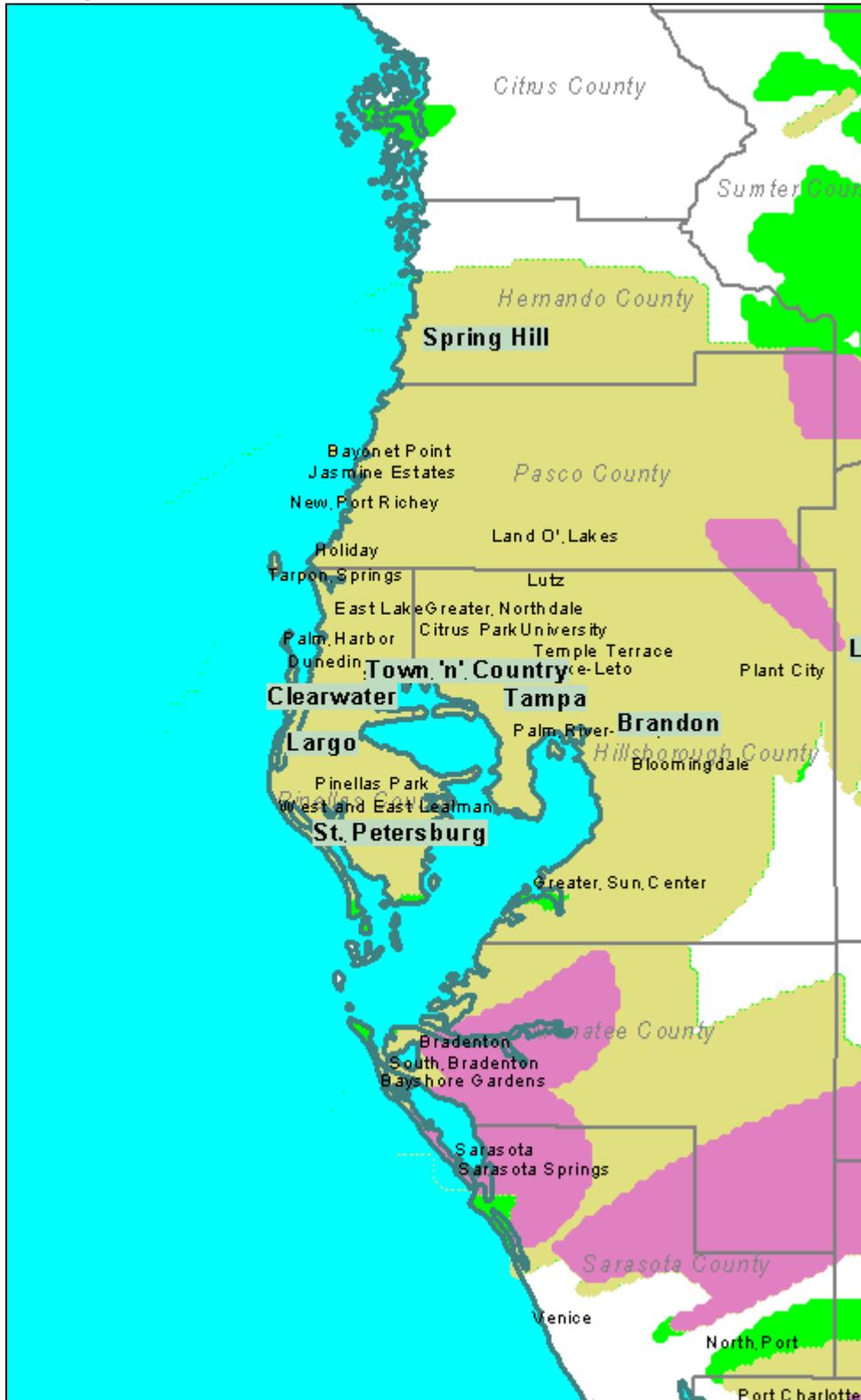
San Diego



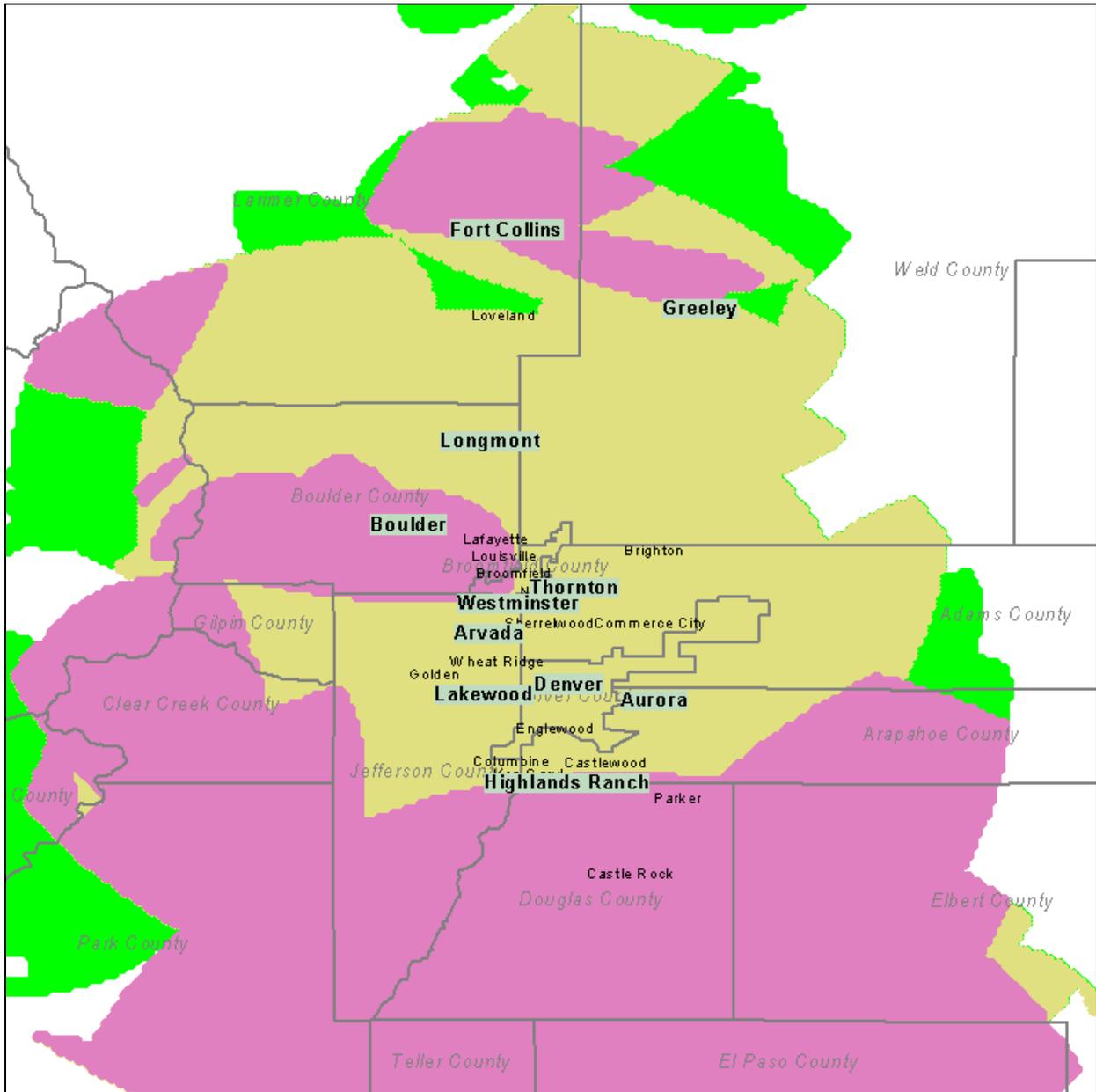
St. Louis



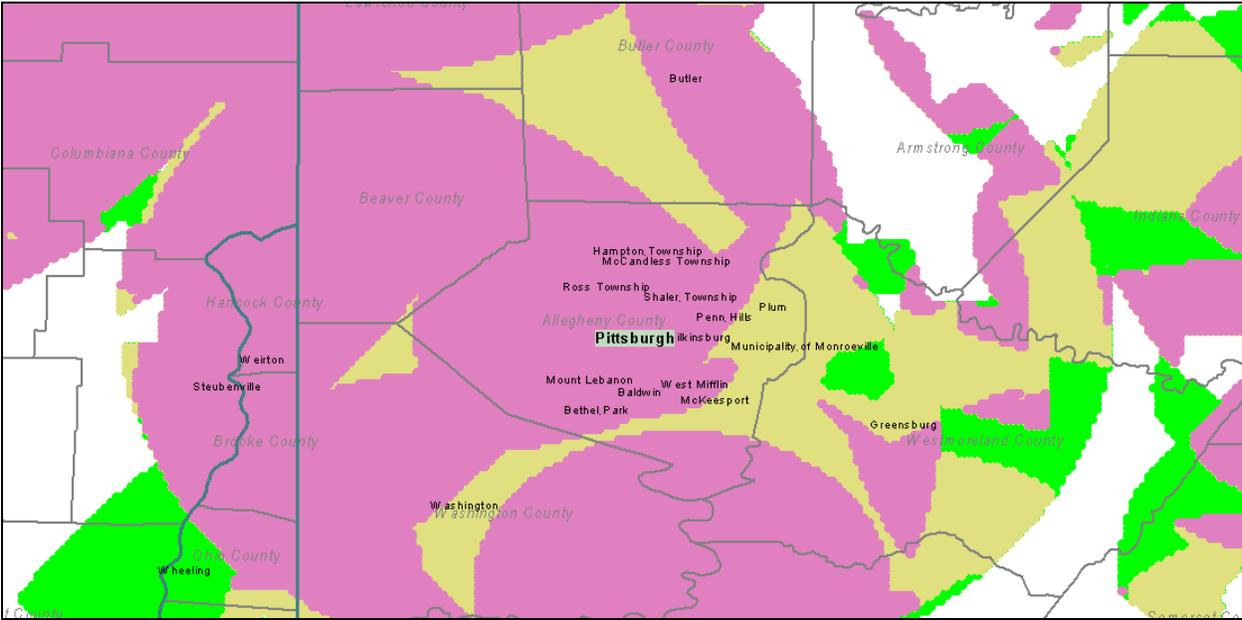
Tampa Bay



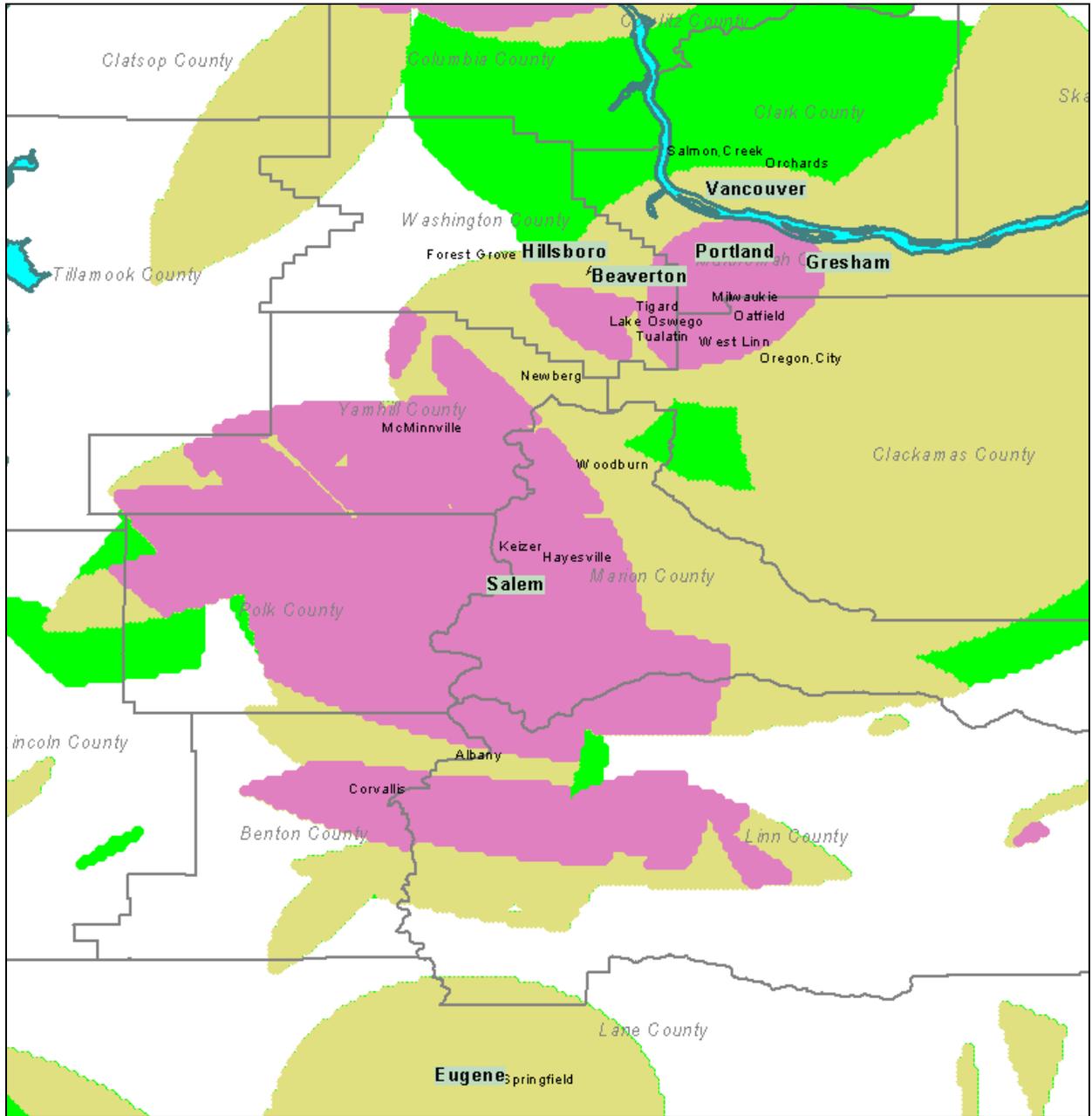
Denver



Pittsburgh



Portland



Cleveland

