

I am writing these brief comments in response to the entities that have filed comments that discourage of the proposed licensed LPAM service. Most of these entities are claiming interference will result from the new AM radio service.

Proposal:

I offer a tangible solution to this alleged problem of interference. Most licensed commercial LPAM stations should only be permitted in the frequency range between 1620 to 1700 on the Medium Wave band. Existing channel spacing rules for licensed expanded band stations should be utilized to facilitate ANY proposed licensed LPAM broadcast stations. This means that under the current spacing rules, if engineering studies prove a 10kw by day and 1 kw by night non directional station may fit into the desired frequency then a 100 watt or less licensed LPAM station may be permitted to occupy that channel. NO INTERFERENCE to existing licensed stations will result from utilizing THE FCC's own engineering practices or by following current FCC spacing guidelines for these stations. Clearly, if a 10 kw or even a 1 kw station with a full quarter wave antenna is permitted under current FCC spacing and interference rules then surely a station with 100 watts or less and a small 40 foot antenna can easily occupy these frequencies with little consequences to existing licensed stations.

Next, I propose that the hundreds of frequencies that are presently dark, be reopened to potential licensed commercial LPAM applicants. Engineering practices, including antenna heights, in the frequencies between 540 and 1600 would have to differ slightly since some of the former stations were daytime only or running at reduced power at night. Still, if present engineering studies permit a 100 watt non directional to fit by daytime and night time, then the frequency should be opened up to potential licensed LPAM applicants. In addition, if desired, the FCC may permit the station applicants in the frequency range of 540 to 1600 to use a lower power level at night, if the applicant desires and the FCC is willing to allow such a practice. This will insure that at least some kind of local AM radio service will be allowed to return to these unused channels.

Many rural communities are too small to support a full power licensed radio station of any sort today due to the cost of operating such a station. But places like WaKeeney, Kansas (never had a licensed station and never will) with a population of 2,000 people and 30 miles from the nearest radio station will be able to benefit from a 10 watt to 100 watt local radio station. Cannon Falls, Minnesota with a population of 4,000 people is roughly 15 to 20 miles away from the nearest local station in Northfield. That AM station is a daytime only and primarily serves its city of license and the towns surrounding it. The next nearest stations in Red Wing are a similar story. The AM 1250 signal barely penetrates into the Cannon Falls area and the FM outlet is more regional in nature.

Dark frequencies can be returned to serve their communities. Places like Lincoln, Maine or Virginia, Minnesota have lost their only local stations to "progress". WLKN AM 1450 Lincoln went dark after the former owner started up and then

moved his FM outlet to Bangor, some 50 miles distant. Virginia lost its only AM station when WEEP AM 1400 went dark after a fire some three years ago.

I would also like to rebuff REC Networks comments that Part 15 unlicensed broadcasters should not be afforded any protection from existing or proposed licensed LPAM stations. By adopting sound engineering practices and spacing guidelines like those that I have proposed, we can insure that every segment of the AM broadcast industry will have at least a bit of space.

Synopsis:

It is abundantly clear that the large entities that do not desire to see new entrants into the commercial AM field do not support a true free market, capitalist society. IBOC poses a much greater interference threat to existing stations than the proposed 100 watt pea shooters.

In addition, REC Network's wish that the Commission should not take into Part 15 AM broadcasters into consideration is foolish. Displacing these legal unlicensed broadcasters is likely to anger many and lead to a greater problem with pirate activity on the FM band. Part 15 AM is an honest outlet for people bitten by the broadcasting bug but don't have the financial means or otherwise to build or buy a licensed radio station. Please do not do anything to take Part 15 AM away from these people or hamper their ability to broadcast.

I urge the FCC Commissioners to adopt the guidelines I have outlined above and those in my original comments in order to insure BOTH existing licensed and proposed licensed LPAM may coexist and serve their cities of license.