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This document is meant at this time to only explain why I feel that a more feasible Low Power AM Broadcasting plan is possible. And I hope that the matter of LPAM will be around for re opening if needed in the future for petitions to be filed to address this public need. What this document represent is an actual draft in the making for a rule making petition that hopefully will be more realizable.

## LPAM Rule Making Petition (This is just a preview for a possible petition that is more feasible.)

### Introduction And Overview

#### *Some Background Information Regarding This LPAM Rule Making Petition*

In this preface section to this (possible future) petition and proposal for rule making in the matter of a Low Powered AM Broadcasting Service on the Mediumwave Broadcast Band the petitioner wants to provide a good overview of the intent and purpose for this submission as a loose outline preface section. And first of all wants to detail a few reasons why there is a need to create a new radio service. This petition then will briefly, in as few paragraphs possible, mention some of the reasons why this proposal is realistic in making the service feasible in terms of working for the interest of the FCC and for the interest of the service users who would be the licensed LPAM station owners. And this would in turn be of interest to the public for their consumption.

**This proposal for Rule Making desires to make the LAMP Service able to run and hence operate smoothly. And to co exist with existing broadcast services and not create interference with those services. And make the service as self policing as possible. Drawing upon the station owners pride to be a high class operator and running as professional a operation as possible. We desire for the LPAM Service to be built upon the existing Broadcast Band plan and channel scheme, and for it to be modifiable if needed by way of Class III Station type of antennas to reduce interference when such antenna changes are required in some regions to reduce interference. And the Service will all be of one set station power class all across the service (10 watt RMS carrier). And this is the basic scheme the service will be founded upon.**

#### **Some reasons for this service:**

Numerous voices over time have reflected various reasons for the need of a new radio service to fill in the unequal gap between major corporation driven interest and the sometimes contrasting and differing views of the public. And so in terms of the concepts of fairness or equity, many private individuals have felt that the interest of the public has been unequally represented and many times misrepresented by the major media mega corporations. Hence the perception is that the corporations are representing their corporate interest and this is true since they are advertising their wares and culturing their market place. Through controlling ownership of the major media via stock shares and chairman seats. And hence the public desires alternatives to such media. A media we the people own and control and is not influenced by the major media. We hope herein to satisfy many of the various interest reflected by the people across the spectrum of the nation.

The peoples needs hence range and vary from such issues as that of needing an outlet for alternative expressions and views, to just wanting to have something different on the radio rather than the same old same old as it is called. And some individuals fancy themselves a disk jockey and as being somewhat artistic with verbal expressions and have a keen ear for good sounding music. And so they want to have an outlet to use those perceived talents they believe they have. And others are interested in how radio works and how to run a radio station from the scientific point of view. Priding themselves on running a nice sounding and clean signal.

In addition, there are many people interested in the idea of the service and not as a broadcaster and station owner, but as merely listeners only. So the defining of the interest includes the many who are only interested in listening to the format and content that new LAMP stations will provide.

#### **Recommended restrictions to use of this service:**

**We feel that this proposed service should not be for high power commercial stations to use in any way.** Meaning those broadcasters with a license for radio services starting at 500 watts and up. Who are commercial and or major media network oriented. Except in the case of those who hold a LPFM non commercial license. And some qualifying shortwaves station's use to place a lower powered signal of their station on the Mediumwave Band in their area. Likewise we feel that this service is not for major network use and hence for taking over. We feel that major corporations with mega dollars as the expression goes, have no need for a very low power intermediate radio service such as this being proposed. And hence can make use of the high powered advantage in the over all market place of which they can easily afford without difficulty. In which such major corporations can afford kilowatt stations and the area of the greater coverage and hence are not hurt or harmed in their larger and vast target market place by this proposed service. And so this broadcast service is for use by those of a much lower financial scenario. Thus the intermediate class station license of the proposed LPAM Service will meet the needs of a broader spectrum of the public.

**The exclusions to the anti corporation clause is as follows:** Local churches who are not using mainstream media as an outlet. And those companies who make type accepted equipment for this service. The stations then will be run by private individuals, as a soul proprietorship and as a limited enterprise. The fact that a person may work in a corporation or own one \*that is not a part of any major media for broadcasting or journalism or commercial advertising, does not restrict them from a license.

Major media for broadcasting or journalism or commercial advertising, is restricted from using this service. Besides highly payed corporate individuals would not want to leave their post and devote time to such a small station operation.

Major media and non main stream media herein are not the same. Non mainstream meaning non major. And hence non mainstream affiliations and associations are not restricted herein; in terms of content sources only, that a small LPAM station may wish to utilize.

#### **Technical scheme:**

**"All stations in this service must agree to share this service with other licensed high powered stations in existence on the band at this time, in the proposed band segment. And that the stations will operate on those channels they find in their areas that are clear, and to make use of On Line data bases and mail order publications to search for clear channels in their region. And that they agree to suffer night time skywave propagation interference from distant high powered stations from across the nation who are licensed to do so, and hence have the priority. And that no station in this service shall operate on a frequency where there is a local high powered station in operation."**

**This Rule Making Petition is about engineering this service to reduce interference with existing stations and stations in the service immediately above the Mediumwave Band and is designed to operate this service in the spectrum of the Mediumwave Broadcast Band in the segment of 1620 kHz to 1700 kHz. The philosophy of this document of proposed rules is based upon some realistic expectations which are as follows. To define the Low Powered Service as truly being low powered and set the power level specification for a 10 watt RMS carrier for use with amplitude modulation. This will be of use to all as a reasonable power level. Using existing type acceptance equipment standards to be applied to a 10 watt RMS carrier transmitter. And that the transmitter should have a 5 element low pass filter at the rf output. And that this power level of operation will be less likely to cause long distance nighttime propagation interference with stations in other states. And in order to make this service feasible and unobtrusive to other existing stations this power level should not be higher than this for any reason. The first center frequency of this service will be on 1620 kHz and the last center frequency will be on 1700 kHz and this will allow for up to 9 LPAM stations locally in any area. The current channel width spacings that exist for use every 10 kHz will be used.**

**Whereas, if there is a licensed local high powered station operating on one of these 9 channels in a station's area that channel is restricted from LPAM use in that location. And intentional interference to that restricted channel will not be tolerated.**

**This petition proposes to make no channel spacings changes whatsoever to the existing Mediumwave Broadcast Band scheme.** State of the art digital receivers for Mediumwave use most all have a channel tuning rate of 10 kHz and could not tune between channels if the spacings were not as they already are.

This petition is not interested in attempting to complicate the service. This service should be designed up to be efficient in it's operation on many levels and thus streamline it's handling requirements by the FCC. And by utilizing some electronic tech and engineering views on the part of the vision of this petition, by those consultants who have an understanding of radio either as electronic repair techs, amateur radio operators or as engineers in the radio industry and so this is the pool of talents drawn upon to engineer up this service.

The petitioner, or petitioner's thereof this petition have endeavored to engineer this service to be, not only technically feasible, but administratively feasible. And have envisioned ways that will help to make this a service easy to maintain. And so, in addition, to submit herein these documents certain Recommendations the FCC may fall back on and utilize if so needed, to smooth out any future problems that may arise. And this is in the section of reference materials enclosed herein. Under Recommendations: To Be Drawn Upon And Used As Administrative Action Rules which are recommendations to be used in future actions for the service. If the FCC desires to follow the wisdom of the recommendations.

#### **Recommended licensing term and filing fee:**

**This petition agrees to making this a licensed service.** And that the license should run for a 8 year period of life before reapplication and processing for a renewal license is filed. And that a processing fee be utilize to fund the handling of the paper work and man hours and processing by the FCC and that the fee be \$225 and that this be a set fee. It is intended that this fee will be of good use to the FCC for the handling of this service and that the 8 year license will mean that the load of refiling license applications will not over load the FCC as it would in a case were the license renewal application would be for a 4 year life. And hence, result in more often application filings and processing. And in this manner the service and it's program will be workable at the FCC offices in charge of this service and it's maintenance.

#### **Intentional radiator specification:**

By democratic process, through consulting the ranks of the various LPAM Interest Groups, who studied this matter of creating this service. The majority view appears to be for an antenna rule be made as follows:

That the antenna for general use in this proposed service be specified as being no higher than 50 feet. And that it be vertically polarized. And that it may utilize a capacitance hat. And that as many as 180 ground radials on or beneath the ground be allowed at no longer a length than 50 feet each. And that a capacitance hat of the kind that the station owner can best fabricate and use be allowed.

In addition the station may use as long a length of coax as is needed to reach the antenna location. And in the proposed rules section there are safety rules devised that have to be followed in reference to near by power lines. Wherein the owner has to keep the antenna erection away from the power lines with a specified clearance that the station owner has to abide by. And thus, in case of a fall during installation the structure will not be able to reach and fall over any power lines.

Likewise some recommendations for possible Class III Station type or similar directional antennas are suggested in the Recommendation section that might be added in the future to resolve channel sharing and available bandwidth conflicts in the future as the service grows. And other possible ideas for aiding stations in mountain regions who have to get the signal to the target through losses in the mountain terrain. Mountain region located stations can be of service in the region for weather reports and other vital information and should be considered a little differently in their antenna pattern needs. In the Regional Band Segment of 1600 to 1710 kHz there are already many high powered class stations using Class III Station type directional antennas for interference elimination according to the Antenna Engineers Handbook and other sources.

#### **Closing comment:**

The vision of this service service is that it will work predicated upon the desire of the users to want to be professional in sound and techniques. And the desire to excel and to prove that they are a contributor to the good of the community by the quality of service they offer. Being that all of the above will be a matter of pride for them. And that they will want to utilize the best ideas and the best skills they can muster. And for the most part only those interested in the service will want to enter it by virtue that they feel they have what it takes to run a station. And perhaps a good number of users will come up out of the amateur radio ranks, and that such skilled people will come to offer their insight to others in the service in the interest of helping other stations to operate effectively and efficiently. And it is expected that many able and skilled individuals will come to write useful hand books for stations to use in the service.

#### **Regarding Suggested Rules:**

The sections on the Rule Making suggestions are written already as if they are licensing rules. And hence will define the rule making guidelines and then can be used as is for the FCC Rules for this service. If the FCC wishes to leave the wordings as is in this submission. This will allow the FCC to get the feel and gist of the actual Licensing Rules for the service. And references for the Rules section, for insights and definitions will be taken from this Introduction And Overview section. And from supplemental notes in the back sections as "Comments And Recommendations" and other possible reference materials related to the contents of this submission that may come to be added.

**This section means that there are rules in progress of being considered for the service this document suggest.**

\* This body of materials was prepared by Dannie Ray Jackson as a draft outline for review by those parties concerned with LPAM Broadcasting. Other paragraphs have been devised on such things as Commercial Advertising.