

I appreciate that the Commission is not undertaking an examination of interference problems caused by low-power FM stations in this proceeding. However, I did want to take the opportunity to raise an issue that I believe should be considered as the FCC moves forward with further LPFM allocations. During the last round of LPFM allocations, the Commission allocated ten LPFM stations to Maine - seven of which were directly on, or one "click" away from, existing full-power FM stations. One of these, which went on the air a few years ago, is at 105.1 FM, licensed to Portland. Our EAS State Plan delineates an Alternative State Primary Network consisting of four overlapping FM stations, among them WBLM/Portland 102.9 FM and WTOS/Skowhegan 105.1 FM. The actual signal area of WTOS is much larger than its grade B contour would make it appear. Unfortunately, WBLM can no longer monitor WTOS for EAS alerts because of interference from the LPFM allocation at 105.1 FM in Portland. This has forced us to realign the input and monitoring assignments of the Alternative SP Network. In allocating future LPFM stations, we urge the Commission to consider not just a computer-model prediction of an incumbent broadcaster's grade B signal, but actual signal conditions "on the ground," in order to avoid direct interference with existing stations. Thank you for the opportunity to comment.