Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Mater of	)	
	)	
Proposed Changes to	)	RM-11643
Process for Amending the	)	
FM Table of Allotments	)	

1. The subject rulemaking proposes to replace the current allocation of FM commercial radio stations by class with a system that would base spacing of FM radio stations on contour overlaps. This proposal would result in commercial FM allocations being handled in the same manner as is currently the case for the noncommercial FM band.

2. Considering the advances in computer technology over the years, the need to simplify FM allotment decisions by limiting stations in the commercial band to a handful of classes has long outlived its usefulness. In view of this, I would like to express my strong support for this rulemaking procedure. Making this change will maximize the efficient utilization of the commercial FM broadcast spectrum, and will promote expanded service to listeners in areas that are currently underserved.

3. I would further propose that the minimum and maximum class contours currently allowed in the noncommercial band be extended to the commercial band. Specifically, this would allow the assignment of a new FM allotment and grant of a construction permit in the commercial band for stations with a class contour of as little as 6 km to the 1 mv/m contour (ie, 100 watts at 30 meters HAAT). The ability to launch new commercial FM stations with limited power and coverage may allow for new service to small communities that currently are unable to support a full powered commercial FM station.

5. For the preceding reasons, I respectfully request that the Commission promptly approve the proposal to modify the way that new stations are added to the FM Table of Allotments.

Respectfully submitted,

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