

Comments on Proceedings on Doc # 99-25 in the matter of LPFM

From my observations as an LPFM operator in a pretty crowded radio market, providing additional diversity to the talk/most popular music formats generally offered by the larger stations has a great appeal to selective segments of the population. Listener comments indicate that our effort to provide a different programming format is greatly appreciated.

Allowing 250 watt stations where possible would enhance LPFM broadcasters efforts to provide that programming to at least some additional listeners in areas such as ours where the population is spread along a narrow but several mile area—the seacoast in the Melbourne-Titusville-Cocoa, Florida market.

Under proposed rules it appears that new applicants may apply in the upcoming LPFM window for a 250 watt station. How existing stations would apply and when is less clear. There are provisions in proposed 73.870 for a station to apply for a “minor” for a short distance move and for a channel change at any future date, but no provision for a 100 watt station to later file for a 250 watt station. A minor change provision should also be available for an increase in power for the following reasons:

First, a power increase would not change coverage by much more than a minor move in location. A location change could even result in 60 dBu service to an area that would not get that level of service from an increase in power at the current location. Therefore if stations are allowed to move with a minor they should be allowed to increase power with a minor as well.

Second is the fact that most LPFM stations don't have the ready cash to change antenna/tower systems or to purchase new transmitters, particularly after having to buy new EAS equipment last year. Most of us have to accumulate the funding for large expenses over time and that may require a year or more. A 2004 survey in the Journal of Radio Studies (posted on the internet) indicated that 68% of LPFM stations responding had annual budgets of between \$ 1,000 and \$ 10,000.

By waiting existing stations would of course take the risk that new stations approved in the next filing window could preclude them from increasing power at a future date.

I suggest that, similar to limited location moves, power increases from 100 watts to 250 watts be permitted by a minor filing. I believe that such a provision would be in keeping with the Congressional intent of a viable low power community radio service.

Ron Hoar
Station Manager
WFHA-LPFM
Windover Farms Homeowners Association
Melbourne, Fl 32934
321-474-3681

