

Dear Federal Communications Commission,

Here are some additional FCC policy suggestions regarding LPFMs and FM Translators:

1) LPFMs should have the same technical rules and regulations as FM Translators, which means they will have the same limit in terms of ERP (250 watts) and they won't have a limit on HAAT just like the current FM translator rules. However, LPFM will remain non-commercial, community-oriented entities just as they are right now.

2) When the next LPFM filing window opens up, the FCC should allow applications for frequencies that are currently a part of TV Channel 6 and are available on most of today's radios (87.5, 87.7, and 87.9 MHz)

3) For analog LPTV stations that are licensed as TV Channel 6 but primarily operate as radio stations on 87.75 MHz, they should be allowed to apply in the next LPFM filing window so they can continue to operate when the analog TV stations cease broadcasting as they transition to digital broadcasting. However, they must apply as non-commercial stations just like the other LPFM applicants and the new station must be within the technical parameters the FCC currently has put in place for FM translators, which is a maximum ERP of 250 watts with no limit on antenna height.

4) LPFMs should be allowed to acquire FM translators in order to convert them to Low Power FM stations and vice versa. However, there is just one caveat, the LPFM station is not allowed to broadcast on a FM translator until the FCC approves the sale transaction and they have been granted the appropriate call letters designated for low power FM stations (i.e.: WXXX-LP or KXXX-LP). The same rules will apply if a company wants to buy a LPFM station and convert it into a translator.

Since both services are considered "secondary services" according to the FCC, they should be allowed to co-exist without any complications or problems but the FCC should give first priority because they provide local programming and serve the local community more effectively than distant FM translators, some of which rebroadcast stations from thousands of miles away.