

Re para 17: The use of terrain-sensitive propagation prediction methods is CRUCIAL to the fair evaluation of new LPFM applications.

Re para 18: "Balancing" of new LPFM applications against the potential for interference to full-service stations should be continued as in the interim waiver policy of 2007.

More importantly, LPFM applications should be allowed to use the Undesired/Desired ratio as has been applied to translators.

In addition, the use of directional antennas should be considered in attempting to protect 2nd-adjacent channel stations.

Re para 19: Yes, it is important to allow a showing by the LPFM applicant that: 1) No fully-spaced channels exist, and 2) that short-spaced conditions can be mitigated by terrain-sensitive calculations/measurements.