Dear Federal Communications Commission,

250 Watt Licenses and the Public Interest:
We are in favor of permitting LPFM stations to operate at 250 watts. Our local residents affirm that this would be of great benefit to the communities that LPFM's serve. For a real-world example, our LPFM operates in a college town. Because The University of Georgia's large campus (and supporting retailers) blanket much of the town landscape, most "Athenians" live on the edges of town (in the immediately adjacent counties). A 100 watt limitation makes it difficult for a LPFM to fully serve a large college community. Unfortunately, even though our listeners' commute to campus is no more than 10-15 minutes, they have complained that they cannot receive our station at their homes. Our listeners have voiced a desire that our radio service reach their homes (not just their school or workplace). An upgrade to 250 watts should remedy this situation and help localized radio stations like ours serve our communities more extensively.

Effective Radiated Power and Channel Spacing:
If the FCC is to apply the more stringent interference protections that FM translator stations and FM booster stations are required to provide (as directed by LCRA), then it would follow that LPFM effective radiated power limits be held to a similar standard (250 watts). Furthermore, it would be counter-productive, anti-local, and disingenuous not to allow a 250 watt LPFM to be licensed at any location where a FM translator or other radio service would be permitted to operate at 250 watts. Clearly, the spirit of LCRA and the intention of Congress is to grant localized community groups access to the airwaves on par with what FM translator stations have enjoyed for decades. This implicitly includes 250 watt caps at the discretion of the Federal Communications Commission.

Special Consideration for Existing Licensees:
We look forward to many more local voices taking to the air waves. We do not believe that 250 watt licenses should necessarily be limited only to existing stations, however, we do believe that upgrades to existing stations should take priority over new licensees. It would be very unfortunate if an existing LPFM that has overcome the odds, successfully operated for several years, and has developed roots in a community were denied a 250 watt license only to have an unproven new comer be granted a 250 watt license in the same community. Perhaps the FCC should allow existing LPFMs to apply for 250 watt upgrades in advance of the new LPFM window. We would also request that the FCC provide ample time (after the finalization of new rules) for existing LPFMs to file minor amendments prior to the implementation of the new licensing window, so that current licensees may take full advantage of the opportunity to upgrade their facilities--in some cases an existing LPFM may need to replace equipment, re-locate, or change frequency prior to applying for a 250 watt license. We ask that the FCC take that into consideration. Philosophically speaking, there is no such thing as a "minor modification" for a small operation like a LPFM. We must be sure of the rules going forward before we can begin necessary preparations for a modification.

Third-Adjacent Channel Interference Complaints and Remediation:
We support the FCC's interpretation of LCRA that Congress has created two different interference protection and remediation regimes?-one that applies to Section 7(1) Stations and one that applies to Section 7(3) Stations.

Suggestions for "Addressing" Section 7(3) Station Complaints:
We support the suggestion that Section 7(3) Stations be relieved of their obligations to cooperate in instances where the complainant does not reasonably cooperate with the LPFM stations? remedial efforts. Also, any bona fide complaint must include accurate contact information and the call signs of both stations involved. Obviously, no broadcaster can be expected to satisfy a complainant if they are uncooperative or cannot be contacted. Additionally, if a complainant cannot accurate identify both stations involved then the complaint can hardly be considered bona fide or actionable. Though LCRA may require the elimination of § 73.810(b)(2) (bona fide complaint must be in form of affidavit and state the nature and location of the alleged interference) due to the rule's requirement of an affidavit, nevertheless, the remainder of the rule in no way conflicts with LCRA. We suggest the FCC continue to require that "bona fide complaints state the nature and location of the alleged interference," so that complaints may be more effectively addressed by broadcasters. This is in the best interest of the public and all parties involved. Additionally, we believe the remaining criterion (bona fide complaints must be received within one year of the date an LPFM station commenced broadcasts) should remain intact. To remove this criterion would possible create undo hardship on fledgling LPFMs. At some point, a station must have the confidence that their license is relatively secure, otherwise additional investments in the enterprise (beyond the initial start-up of operations) may never take place. Additionally, LCRA expressly affirms this by repeated referring the effected stations as "newly constructed." Arguably, to remove this specific criterion would in itself be in violation of LCRA.

Thank you for your consideration!

Submitted through Conexus.fm & NexusBroadcast.com Comment System