

I support the creation of new Low Power FM stations, with LPFM retaining their secondary status (staying level with translators).

I renounce the idea of a cap for translator filings due to the infrequency of filing windows.

I also recommend the use of the existing translator allocation (contour based) rules for LPFM rather than the inadequate LPFM spacing rules presently in use. This would allow untold thousands of LPFMs to be created without running afoul of the congressional ban on 3rd adjacent spacing rules.

And I recommend the permission for translators to minor change to any vacant channel when interference is predicted or experienced, just like LPFM experiences today. This provision was not needed before filing windows, but with the dearth of filing opportunities, many established listener communities have lost service of a favorite translator as a new full service station has come into service on the same channel.