Common Frequency
PO Box 4301
Davis, CA 95617

March 9, 2012

Marlene H. Dortch
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: MM Docket 99-25
LPFM I.F. Spacing in San Francisco

Dear FCC:

The nonprofit Common Frequency undertook the study below on behalf of Media Alliance, an Oakland-based nonprofit media resources and advocacy organization serving the San Francisco Bay Area since 1976. San Francisco nonprofits wanted to understand the impact of the Commission's proposed translator processing plan in relation to future availability of LPFM within the city.

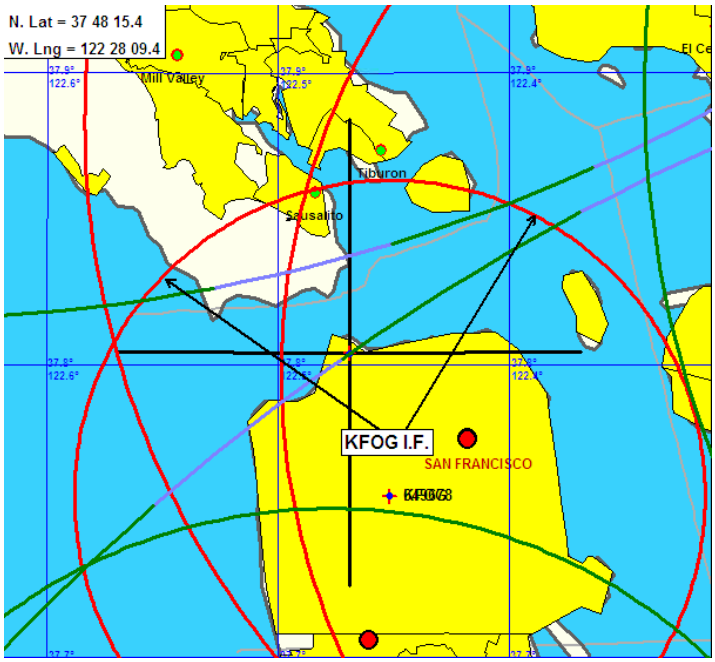
Common Frequency previously submitted a letter stressing that LPFM I.F. spacing could be a key factor limiting LPFM availability in certain core urban areas. The San Francisco study below exemplifies the case where LPFM availability will be impacted if LPFM I.F. spacing is not lifted prior to ensuring LPFM channels.[1] Such a circumstance could occur in cities where FM broadcast sites are chiefly co-located in the middle of the market amid the densest population.

If translators are processed without accounting for this factor, a number of LPFM channels could be lost in urban areas. Thus, we feel it is important for the Commission to reserve LPFM channel availability while excluding I.F. spacing rules as translators are currently allowed.[2]

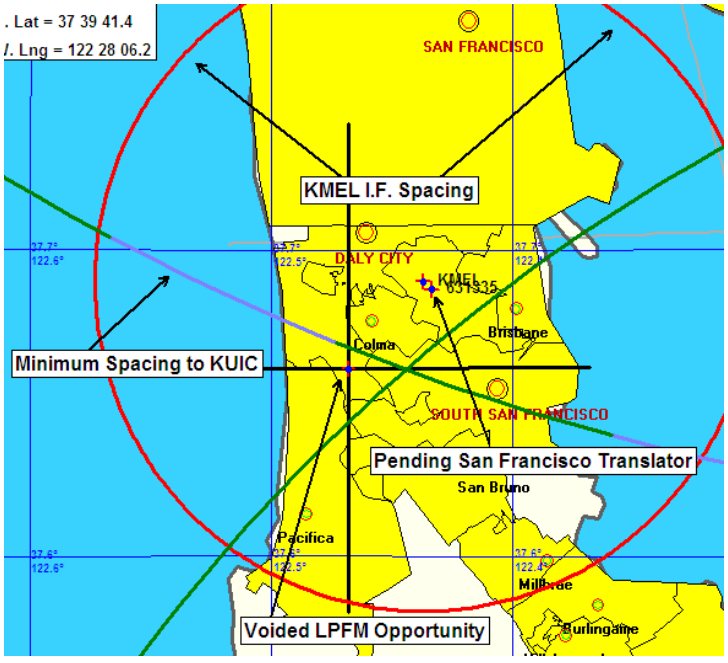
I.F. CASES:

Excluding pending translators, San Francisco has several prospective LP-100/LP-10 channels with different degrees of intervening I.F. overlap.[3]

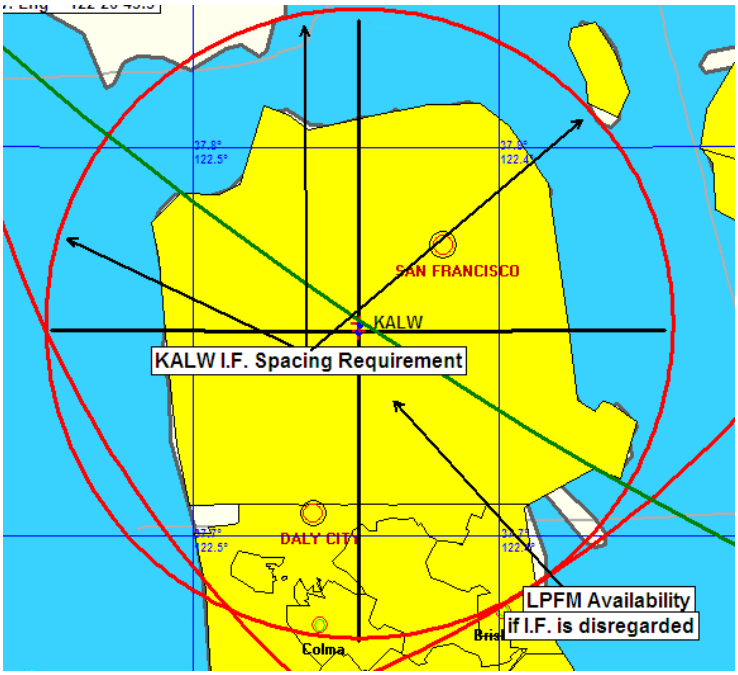
[1] Simultaneously taking into consideration the assumption that if an LPFM facility cannot be fully spaced on a channel in an area, a pending translator could be continued to be processed.
[2] Translators under 100 watts need not protect I.F.
[3] Prospective San Francisco LP-100 or LP-10 channel and intervening I.F. channel: CH 229 KFOG, CH 237 KMEL, CH 241 KFRC, CH 245 KSAN, CH 257 KQED, CH 261 KPOO, CH 273 KALW, CH 277 KREV.



Example 1: Above shows the KFOG I.F. spacing that precludes a local LPFM from being licensed in northern San Francisco. Because an LPFM service cannot be accommodated on that channel, the FCC could grant that radio channel to pending translator applicants (either satellite-relayed broadcast network Educational Media Foundation, or another satellite-relayed, non-local network called Your Christian Companion).



Example 2: Above shows the KMEL I.F. spacing that precludes a local LPFM from being licensed on the San Francisco peninsula. Because of this Educational Media Foundation, with a pending translator there, could be offered the channel first.



Above shows no opportunity for LPFM on 102.5 FM in the city of San Francisco due to the I.F. spacing required by KALW. That leaves two radio channels left in San Francisco for possible LPFM use: 96.1 FM, and 96.9 FM. 96.1 FM cannot be used in half of San Francisco due to the I.F. spacing requirement to KFRC. The KSAN I.F. precludes LPFM usage on 96.9 FM in 90% of San Francisco.

The final LPFM-translator scorecard in the city of San Francisco at the end of all translator/LPFM processing could be:

TRANSLATORS (Freq, Call, Coverage)		**NEW LPFM (Freq, Call, Coverage)**	
88.9 FM K205BM	All San Francisco	96.1 FM (TBA)	Part of San Francisco
93.7 FM NEW	All San Francisco	96.9 FM (TBA)	Part of San Francisco
95.3 FM NEW	All San Francisco		
100.9 FM K265DI	All San Francisco		
104.1 FM NEW	All San Francisco		
101.7 FM K269FB	All San Francisco (CP)		

At the end, 75% of San Francisco secondary-service channels could be held by translator licensees. Since translators can have a maximum of 5.5 times the coverage of an LPFM facility, translators would then have 16.5 times the coverage in San Francisco compared to LPFM. We view scenario as a licensing imbalance, especially as a single non-local translator network could have more signals in San Francisco in the end than total local LPFM licensees. 104.1 FM additionally could be allotted to Broadcast Towers, Inc., an established translator seller.[4]

[4] BTI has sold FCC translator grants K298AW, K298AZ, W248AU, K289AS, K268BH, K277BN in addition to entering into a consent agreement with the FCC after attempting to migrate translators from the Florida Keys to Miami. *See FCC DA 11-951*.

LP-10 VIABILITY

Five more channels could be opened in San Francisco using LP-10 service without dismissing any more translators that would be dismissed reserving room for LP-100 service:

103.3 FM: Added use in Richmond, Sausalito, and San Francisco (translator on this channel would be dismissed by LP-100 reservation).

102.5 FM: Added use in San Francisco, Oakland, South Marin County (translator on this channel would be dismissed by LP-100 reservation).

100.1 FM: Added use in San Francisco, South Marin, Richmond/Berkeley area (translator on this channel would be dismissed by LP-100 reservation).

99.3 FM: Added use in San Francisco, Berkeley, South Marin County (translator on this channel would be dismissed by LP-100 reservation).

97.7 FM: Opens San Francisco, South Marin, and Hills east of Oakland (no translator applications currently on this channel).

San Francisco LP-10 channels could cover approximately 270,000 to 430,000 people per channel within their 60 dBu contours. This is substantial new community service and represents greater coverage than most currently-licensed LP-100 stations. In major metropolitan areas, LP-10s may provide coverage to communities who otherwise would have no access to LPFM, and population density would make such stations even more viable than LP-100 located in small towns.

Please consider accounting for the possible removal of I.F. protections when reserving LPFM frequencies prior to processing translators. Thank you.

Respectfully,

Todd Urick
Tech Director,
Common Frequency