

provide more detailed information regarding the effect of reduced Class A protection on the functioning of the Emergency Alert System (EAS) and the Integrated Public Alert and Warning System (IPAWS).

2. Kentucky Mountain Bible College supports the FCC's proposals that would result in many daytime-only AM stations on the same and adjacent frequencies to Class A AM stations being able to operate at night, or operate with greater power levels. The FCC proposes several different technical approaches to changing the protections for Class A AM stations. Kentucky Mountain Bible College is leaving the technical aspects of the proposals to consulting engineers but responding in support to the non-technical questions set forth in the Second Further NPRM. The FCC's proposals, if adopted, will enable many AM daytime-only stations, and those AM stations with severely-limited nighttime power, to obtain credible nighttime service.

II. WIDE-AREA SERVICE THAT WAS ONCE THE EXCLUSIVE PROVINCE OF CLASS A AM STATIONS IS NOW SUPPLANTED BY OTHER MEDIA SUCH AS FM STATIONS, SATELLITE STATIONS AND INTERNET STREAMING

3. Kentucky Mountain Bible College submits that the broadcast landscape is completely different than when the current FCC regulations were written. Not only are there many competing media options now, but there are many new venues available to the Class A AM stations that did not exist before. For example, the Class A AM stations in WBFC's area also stream online,

meaning they have more options to reach people within their large protected AM area.

III. THE POSITIVE EFFECT UPON RADIO LISTENERS IN GENERAL FROM REDUCED PROTECTIONS TO CLASS A STATIONS AND RESULTING POWER INCREASES FOR CO- AND ADJACENT-CHANNEL AM STATIONS

4. In the particular area of Kentucky Mountain Bible College in rural Eastern Kentucky, most of the Class A stations are located in the larger cities and higher populated areas like Lexington. They don't really address issues and concerns of the local Stanton community.

5. Also, specific to our area, most of the Class A stations operate in areas where internet access and cell service are readily available, meaning people can listen to them via online streaming and other means if interested. In the Kentucky Mountain Bible College specific area, internet access is largely limited and cell service is patchy in many areas, leaving AM and FM broadcast the best or only means for many in our area to listen.

6. A WBFC power increase in nighttime service would allow us to serve the people in our local community with the content and programming that they love. A year or two ago, we heard from a listener that was outside of our nighttime coverage, but had a family member who lived in town and could still receive our broadcast all the time. They said she often called her family member on the phone so they could put the phone up to the radio so she could listen, as that

was the only way she could receive our programming due to our limited nighttime coverage.

IV. A WBFC NIGHTTIME POWER INCREASE DUE TO REDUCED PROTECTIONS FOR CLASS A AM STATIONS WILL FAVORABLY IMPACT SERVICE TO OUR COMMUNITY

7. Our current nighttime coverage barely allows us to reach our city of license. In our rural location, our nighttime coverage reaches a population area of 4,000-6,000 people. Many of our listeners are interested in our evening and nighttime programming but can't receive it because of power limitations.

8. If WBFC was allowed higher power during the evening and nighttime, we could reach a population area of 150,000 people or more. That's a 2400% increase. Our nighttime coverage is so small that we barely serve our community after sundown. We have added online streaming options to better serve our community but many of our listeners don't have the needed internet access or ability to listen online.

9. Increased power during the nighttime is the only current way that we can realistically serve our community during those hours. One such example is from the most recent elections. We couldn't report our local election results until the following day because by the time we received the results from the County Clerk's office we were already on low power and the majority of our listeners could no longer receive the broadcast.

V. THE MINIMAL EFFECT REDUCED PROTECTIONS FOR CLASS A AM STATIONS WILL HAVE UPON EAS AND IPAWS EMERGENCY ALERTING SYSTEMS, AND THE POTENTIAL BENEFITS TO HAVING MORE LOCAL NIGHTTIME SERVICE AVAILABLE ON THE AM BAND DURING EMERGENCIES

10. The majority of the Class A AM stations in the WBFC area are in the bigger city areas like Lexington. Those stations don't really cover issues and concerns in our Stanton community.

11. The majority of people in our community are listening to the local stations. It would be a great benefit to the community for these local stations, such as ourselves, to have greater nighttime service to provide the kinds of information and updates that we are currently unable to do with our limited coverage area.

VI. CONCLUSION

12. Kentucky Mountain Bible College supports the Commission in its proposed rule changes to assist AM broadcasters by changing certain daytime, nighttime, and critical hours interference protection standards as they apply to certain classes of AM stations.

Respectfully submitted,

KENTUCKY MOUNTAIN BIBLE COLLEGE

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