

BEFORE THE
Federal Communications Commission
WASHINGTON, DC 20554

In the Matter of)	
)	
Revitalization of the AM Radio Service)	MB Docket No. 13-249
)	
Second Further Notice of Proposed)	
Rulemaking)	

To: The Commission

**COMMENTS OF THE
CRAWFORD BROADCASTING COMPANY**

Crawford Broadcasting Company (“Crawford”) and its affiliates are licensees of 24 AM and FM commercial broadcast stations¹. As an established licensee and operator of AM stations, Crawford has a great interest in the Commission’s efforts to revitalize the senior broadcast band. We submit the following comments in response to the Commission’s Second Further Notice of Proposed Rulemaking (“2nd FNPRM”), issued in the above-captioned proceeding on October 5, 2018.

We generally agree with all the rule changes proposed by the FCC in the 2nd FNPRM, and we provide the following responses to specific proposals:

A. FCC Proposal A. – Change Nighttime and Critical Hours Protection to Class A AM Stations

We believe that it would be appropriate to continue to provide protection of the large daytime coverage areas of Class A stations from daytime transitional skywave interference during critical hours to the 0.5 mV/m groundwave contour. For very practical reasons, including simplified engineering analysis, we propose that the calculations be done on a site-to-site basis.

Concerning nighttime protection of class A stations, we support Alternative 1 as proposed, providing protection to the 0.5 mV/m groundwave contour. Again, for simplified engineering analysis, we propose that calculations be done on a site-to-site basis.

We believe this will have an immediate benefit for many class B stations and their listeners by permitting those stations improved service at night, and it will permit many class D stations to convert to class B and begin providing nighttime service to their communities. These changes would also benefit class A stations that share a frequency with another class A station, permitting them to make improvements in their nighttime facilities.

¹ Crawford affiliates include KBRT, Costa Mesa, CA; KNSN, San Diego, CA; KCBC, Manteca, CA; KKPZ, Portland, OR; KLZ/KLDC, Denver, CO; KLTT, Commerce City, CO; KLVZ, Brighton, CO; WDCX-FM/WDCZ, Buffalo, NY; WDJC-FM/WYDE/WXJC, Birmingham, AL; WYDE-FM, Cordova, AL; WXJC-FM, Cullman, AL; WMUZ-FM, Detroit, MI; WMUZ, Taylor, MI; WCHB, Royal Oak, MI; WRDT, Monroe, MI; WDCX, Rochester, NY; WPWX, Hammond, IN; WSRB, Lansing, IL; WYRB, Genoa, IL; WYCA, Crete, IL

We do not see these proposed changes diminishing the reach of EAS alerts from class A stations, as the facilities of those stations will not be reduced in any way.


B. FCC Proposal B. – Change Nighttime RSS Calculation Methodology; Change Daytime Protection to Class B, C and D Stations

Crawford continues to support the proposed changes in the nighttime RSS calculation rules for reasons stated in our previously filed comments².

We also continue to support the proposed changes to the daytime protection to class B, C and D stations, including restoring the first-adjacent protection ratio to 0 dB, the second-adjacent prohibited overlap to 25/25 mV/m, and eliminating third-adjacent channel protection.

In accordance with our previously filed comments, we continue to recommend a change in the daytime primary service contour for class B, C and D stations to 2 mV/m, and we continue to recommend an increase in the class C power cap to 5 kW³.

Respectfully submitted,
CRAWFORD BROADCASTING COMPANY



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² Comments of the Crawford Broadcasting Company in the Matter of Revitalization of the AM Radio Service, MB Docket No. 13-249, FCC 15-142 (“Comments”) at B.

³ Comments at C.