

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

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

**COMMENTS OF MULTICULTURAL RADIO BROADCASTING LICENSEE, LLC  
AND WAY BROADCASTING LICENSEE, LLC**

Multicultural Radio Broadcasting Licensee, LLC (“MRBL”) and Way Broadcasting Licensee, LLC (“Way”), licensee of 33 AM stations (none of which are Class A)<sup>1</sup> hereby submit these Comments in response to the October 5, 2018, *Second Further Notice of Proposed Rule Making* (“2nd FNPRM”), FCC 18-139, in the above-captioned proceeding.

MRBL/Way support the Commission’s proposal to modify the daytime protected groundwave contour of Class A stations to their 0.5 mV/m contour. There is general agreement amongst various engineering experts that due to the ever increasing electrical noise environment, the useful AM service contour has been raised to the 2 mV/m contour. MRBL/Way have many stations in urban areas that serve minority populations but, due to the restrictions imposed on protecting Class A stations, the MRBL/Way stations are not able to reach significant areas where minority listeners reside. Furthermore, in some cases, multi-tower arrays could become non-directional which would be of great benefit to the public by allowing the land to be used for more environmental friendly purposes.

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<sup>1</sup> MRBL and Way have 28 Class B and 4 Class D stations.

As for critical hours and nighttime Class A protections, MRBL/Way agree with the comments offered by duTreil, Lundin and Rackley and by Hatfield and Dawson, that recommend Alternative 2 in both cases. By allowing these changes, the MRBL/Way stations could better serve their minority audiences.

One by-product of these proposed changes would be the impact they would have on FM translators. The Commission has recently authorized over a thousand new translators for AM stations. Many AM stations have come to rely on the new listenership strictly on the FM band as a result. By expanding the 2 mV/m contours of many AM stations, FM translators could expand their coverage as well.

MRBL and Way hereby support the Commission's effort to improve the AM service by revising the protection standards in effect for Class A stations. Such modifications would significantly benefit multiple stations owned by MRBI and Way, as they would be able to reach their minority audiences much better as well as expand their service to the public at large.

Respectfully submitted,

/s/

H. Jane Chon, Counsel  
Multicultural Radio Licensee, LLC  
Way Broadcasting, LLC

February 8, 2019