

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Revitalization of the AM Radio Service	)	MB Docket No. 13-249
	)	

**REPLY COMMENTS OF ANCHOR BAPTIST BROADCASTING INC.**

Anchor Baptist Broadcasting, Inc. (“ABB”) files these reply comments in support of certain proposals in the Commission’s *Second Notice of Proposed Rulemaking*<sup>1</sup>—namely, the proposal to reduce the protections afforded Class A radio stations at night, which would result in significant local benefits for listeners in ABB’s listening area. Some commenters have already described the benefits to be gained by listeners of daytime-only AM stations that are likely to result from the reduced Class A protections proposed in the *Notice*.<sup>2</sup> ABB agrees that the Commission’s proposals promise important benefits, particularly to the listeners of stations in less populated, rural areas. ABB therefore joins those commenters in urging adoption of the proposals in the *Notice*.

ABB operates WGCR(AM), Pisgah Forest, North Carolina (FCC Facility ID No. 2198) (“the Station”), which is licensed for daytime broadcasting on 720 kHz. The Station operates on 720 kHz with a daytime power of 50,000 watts and a “critical hour” power of 15,000 watts.

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<sup>1</sup> *Revitalization of the AM Radio Service*, Second Further Notice of Proposed Rulemaking, MB Docket No. 13-249, FCC 18-139 (rel. Oct. 5, 2018) (“*Notice*”).

<sup>2</sup> See, e.g., Comments of Kentucky Mountain Bible College, MB Docket No. 13-249 (Jan. 16, 2019) (“KMBC Comments”); Comments of du Treil, Lundin & Rackley, Inc., MB Docket No. 13-249 (Jan. 2, 2019) (“dLR Comments”).

Because it shares the same frequency as Class A AM station WGN in Chicago, WGCR currently is allowed to broadcast only from sunrise to sunset.<sup>3</sup>

If the Commission's AM rules were modified as proposed in the *Notice*, WGCR would be able to expand its operations, to the significant benefit of listeners in the surrounding communities. Although such an expansion would cause WGCR to incur additional operating expenses, it would substantially advance WGCR's ability to serve listeners in the mountainous communities within WGCR's reach. Anchor Baptist therefore joins those commenters who urge adoption of the proposals in the *Notice*.

WGCR today provides its listeners with programming and informational content that they are otherwise unlikely to receive. The multiple commercial FM stations that surround the mountainous communities within WGCR's broadcast area primarily direct their programming toward nearby large, metropolitan markets, such as Charlotte, North Carolina, Greenville, South Carolina, and Spartanburg, South Carolina. By contrast, WGCR provides important information relevant to Pisgah Forest and surrounding mountain communities, such as local emergency and inclement weather information, local and regional headlines every weekday, and local weather information at the top and bottom of every hour. Additionally, WGCR's programming provides a

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<sup>3</sup> Although Anchor Baptist maintains an FM Translator Station, W235CA, which rebroadcasts WGCR and is authorized for nighttime operations, W235CA's coverage is more limited than WGCR's potential coverage under the *Notice*'s proposed alternatives to protect Class A AM stations during critical hours and at night. More specifically, W235CA is limited to a maximum effective radiated power of 250 watts. This power limitation causes W235CA's predicted contour to fall well short of WGCR's 2.0 mV/m service contour, and, therefore, well short of WGCR's potential reach under the Commission's proposals. Moreover, W235CA is ringed by mountain ranges, jeopardizing listener reception of W235CA's FM signal as compared to the largely uninhibited AM service WGCR's listeners would be able to obtain under the Commission's proposals.

unique local resource devoted to the spiritual well-being and enrichment of its listeners—“to the Local Church, by the Local Church, and for the Local Church.”<sup>4</sup>

However, at present, the Station’s locally-focused broadcasts are limited to daytime hours. Without nighttime authorization, WGCR cannot supply valuable local news, weather, and emergency information to listeners in surrounding mountainous communities when it is often most needed: after the sun sets and temperatures drop, creating dangerous conditions for morning commutes and necessitating various school, business, and institutional closures or delays. And it is during those same nighttime hours that many of WGCR’s listeners are likely to take time to reflect—and therefore to seek the spiritual guidance and comfort WGCR’s programming offers.

As with the stations identified in the Comments of Kentucky Mountain Bible College and the Comments of du Treil, Lundin & Rackley,<sup>5</sup> the data regarding WGCR’s potential expanded reach demonstrate the tremendous benefit many rural AM stations would realize under the Commission’s proposals. To better assess the benefits that could be realized from such an expansion in the Station’s nighttime reach, WGCR commissioned an engineering analysis of the effect that relaxation of the Commission’s AM rules would have on its operations. See Ronald D. Rackley, du Treil, Lundin & Rackley, Inc., *Predicted Groundwave Critical Hours Coverage Contours* (hereinafter *Critical Hours Coverage*); Ronald D. Rackley, du Treil, Lundin & Rackley, Inc., *Predicted Nighttime Coverage Contours* (hereinafter *Nighttime Coverage*).<sup>6</sup> Notably,

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<sup>4</sup> WGCR, *About Us*, <https://www.wgcr.net/index.php/about-us> (last visited Mar. 1, 2019).

<sup>5</sup> See KMBC Comments pp. 4-5 (describing a potential 2400% increase in the station’s reach if the Commission allows increased nighttime operations in keeping with the *Notice* and the importance of the station’s locally-focused programming to listeners in the community); dLR Comments p. 3 & Figures 1-3 (illustrating individual Class B AM stations’ potentially improved coverage under the proposals in the *Notice*).

<sup>6</sup> Copies of both engineering analyses are attached as exhibits A and B, respectively.

WGCR's population coverage during critical hours would nearly double under both of the Commission's proposals. *See Critical Hours Coverage* (predicting population-reach gains of 177,964, 426,634, and 640,166 across the 5 mV/m, 2 mV/m, and 0.5 mV/m contours, respectively). Both of the proposed modifications would expand WGCR's reach during critical hours by nearly **1.25 million** potential listeners. Accordingly, ABB strongly urges the Commission to adopt either alternative regarding the relaxation of critical hours protection.

A similar result cannot be expected from the Commission's proposals to relax the rules governing nighttime coverage: The two alternatives under consideration would result in meaningful differences in reach. Under the Commission's Alternative 1, WGCR's reach would extend to 4,652 potential listeners, while Alternative 2 would extend WGCR's reach to 16,546 potential listeners—**an increase of greater than 3 times** over Alternative 1. *See Nighttime Coverage*. Accordingly, although ABB urges the adoption of at least one of the proposed alternatives so that WGCR may better serve its nearby and often-underserved local communities, ABB strongly urges the Commission to adopt Alternative 2 given its potential to expand WGCR's reach far more significantly.

In particular, Alternative 2 would permit WGCR to reach the whole of Brevard, North Carolina, the city directly adjacent to Pisgah Forest and a community to which WGCR focuses important aspects of its programming, via nighttime broadcasts over its FM translator station. WGCR often broadcasts emergency information relevant to Brevard, such as school closings at the Brevard Academy and power outages throughout the city and nearby unincorporated communities. Expanding the Station's ability to broadcast nighttime news updates, spiritual guidance, and programming particularized or relevant to Brevard would provide meaningful service to one of WGCR's most populous local communities.

In sum, under any combination of the Commission’s proposed alternatives, the Station’s expanded operation and reach that would result from relaxation of the rules would have significant benefits to WGCR’s listeners. The Station’s listeners have confirmed the value and importance of its existing programming, noting that WGCR: “will encourage you . . . and lift your spirits”; delivers content that is “wonderful, spirit-filled and thought-provoking”; and provides information and programming that “helps [listeners] get through the day.”<sup>7</sup> WGCR seeks to provide this content to an even larger group of listeners and to be able to reach those listeners during other significant parts of the day (and night). The empirical data demonstrate that the Commission’s proposals would provide precisely such an opportunity to expand the Station’s reach—so that local listeners could receive relevant WGCR programming (including news, emergency and inclement weather information, enriching spiritual material, and more locally focused content) instead of talk radio from Chicago that is irrelevant to the Station’s listeners—and, accordingly, its ability to serve its local communities and listeners. Consequently, WGCR respectfully urges the FCC to adopt the proposals to reduce the protections afforded Class A radio stations at night and during critical hours as set forth in the *Notice*.

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<sup>7</sup> Facebook, Anchor Broadcasting—*Reviews*, <https://www.facebook.com/pg/anchor.broadcasting/reviews/> (last visited Mar. 1, 2019).

### **Conclusion**

For these reasons, WGCR respectfully requests that the Commission implement the relaxation of the rules providing AM protection for Class A stations.

Respectfully submitted,

/s/ Stephen Hartzell

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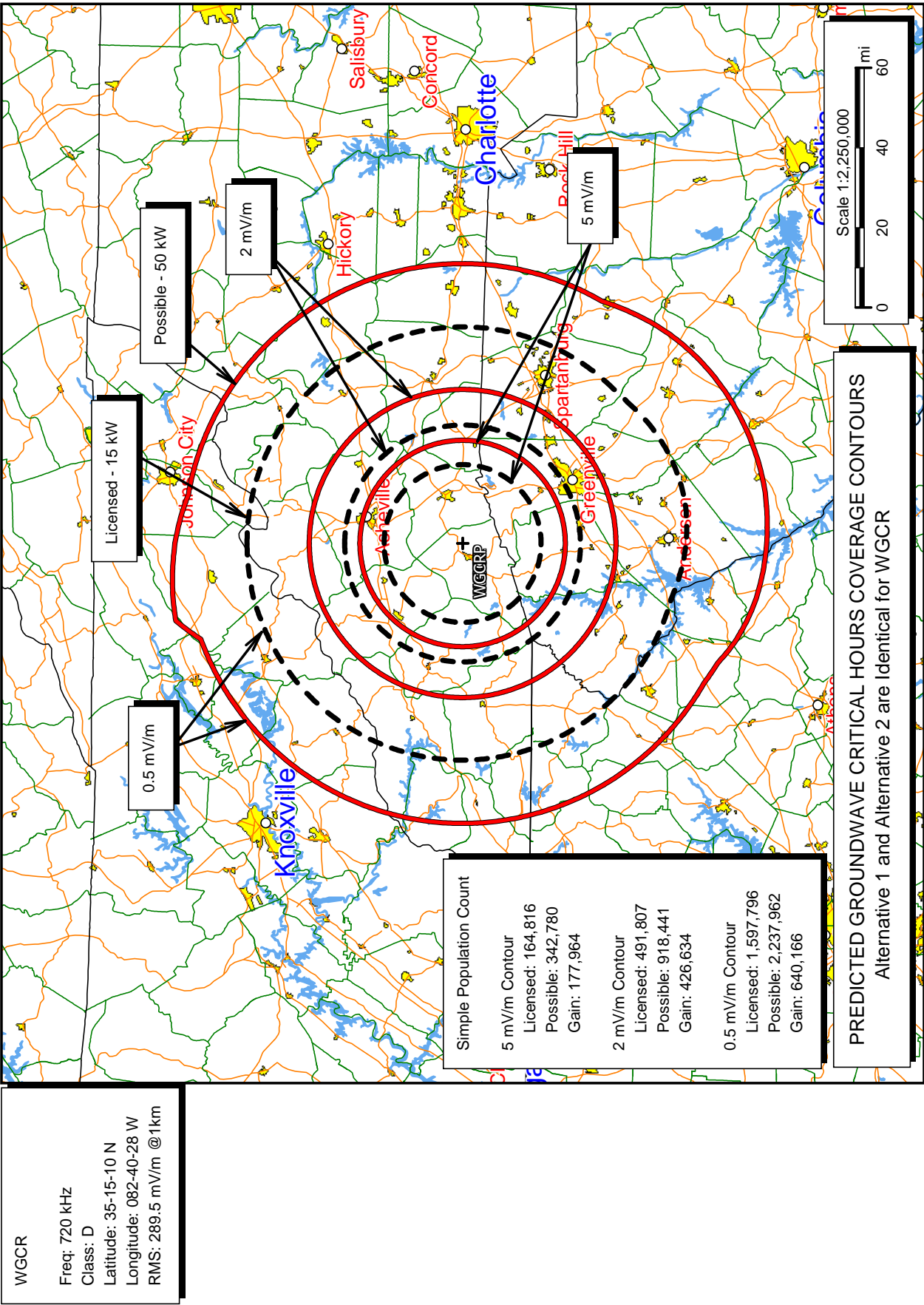
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# **Exhibit A**





# **Exhibit B**

