

**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 UNIVERSAL STATIONS LLC

Universal Stations LLC (“Universal”) submits these reply comments following review of comments filed in the above-captioned proceeding.¹ Universal recognizes that some of the proposals raised by the Commission’s SFNPRM elicit disparate reactions from interested parties in this proceeding and that the Commission may want more time or information before acting on those proposals. But, as the record in this proceeding also demonstrates, there are certain other proposals that are non-controversial and that the Commission can act on now to provide immediate relief to AM broadcasters in furtherance of the Commission’s ongoing efforts to assist AM broadcast stations in providing greater and improved service to the public. AM broadcasters and the public interest are not served by delaying resolution of those simpler issues pending resolution of the more complicated issues implicated by the SFNPRM.

One of those non-controversial issues that is ripe for prompt resolution is the Commission’s proposal to eliminate third adjacent channel groundwave protection, which

¹ *Revitalization of the AM Radio Service*, Second Further Notice of Proposed Rulemaking, MB Docket No. 13-249, FCC 18-139 (rel. Oct. 5, 2018) (“SFNPRM”); *see also Revitalization of the AM Radio Service*, First Report and Order, Further Notice of Proposed Rulemaking, and Notice of Inquiry, 30 FCC Rcd 12145 (2015). These reply comments are timely submitted pursuant to the Commission’s January 29, 2019 Public Notice extending filing deadlines due to the lapse in government funding. *Revisions to Filing and Other Deadlines Following Resumption of Normal Commission Operations*, Public Notice, DA 19-26 (rel. Jan. 29, 2019).

received broad support from commenters.² Modern receivers are better than ever before at rejecting adjacent channel interference, rendering unnecessary the Commission's current third adjacent channel protection requirement. Elimination of third adjacent protections will have no impact on Class A stations or nighttime interference concerns,³ nor will it implicate any of the public interest, safety or similar issues raised by commenters such as FEMA or the AM Radio Preservation Alliance. Rather, elimination of the antiquated third adjacent channel protection requirement would simply acknowledge that filters are exponentially better today than they were when third adjacent protections were initially adopted and therefore such protections are no longer necessary or in the public interest but instead unnecessarily increase the costs of operating small AM broadcast stations and stifle the ability of small local AM stations to reach a broader local audience.

Prompt elimination of third adjacent protections would provide immediate relief to lower power stations that need the Commission's help the most. Some of these stations are currently

² See, e.g., Comments of Carl T. Jones Corporation (filed Feb. 7, 2019), at 4 ("We note almost universal support among commenters, including ourselves, for the Commission's proposal to . . . eliminate the third adjacent channel protection requirement."); Comments of Timothy C. Cutforth P.E. (filed Jan. 15, 2019) at 4 ("Third adjacent emissions are essentially no longer a consideration and second adjacent emissions are not significant on most stations."); Comments of TZ Sawyer Technical Consultants (filed Jan. 21, 2019) at 2 ("TZS urges the Commission to adopt . . . deletion of the third-adjacent channel protection requirement for all station classes immediately, while preserving the 0.5 mV/m groundwave contour protection to Class B, C, and D until it is resolved in a further notice."); Comments of Charles M. Anderson (filed Jan. 30, 2019) at 2 ("The proposed change for 2nd adjacent channel protection to 25 mV/m . . . is also supported along with elimination of 3rd adjacent channel protection which is entirely justified given the current occupied bandwidth."). In contrast, only one commenter briefly expressed general concern about "proposed degradations in 2nd- and 3rd-adjacent interference protections" overloading digital receivers, but provided no support, engineering or otherwise, for this conclusory statement. See Reply Comments of Kintronic Laboratories, Inc. (filed Feb. 19, 2019) at 3.

³ See, e.g., Comments of Carl T. Jones Corporation ("In the absence of receiver performance data to the contrary, it is our opinion that [elimination of third adjacent channel protection criterion] will not cause material interference in the AM band.").

required to operate with two transmitter facilities or complex antenna systems for the sole purpose of complying with the third adjacent channel protection requirement. This outdated restriction not only increases the costs for already struggling small AM broadcasters but also unnecessarily limits their ability to reach a broader local audience. Elimination of the third adjacent channel protection requirement would enable these stations to more effectively use their limited resources and otherwise improve their facilities to better serve their communities.

Accordingly, and for the reasons set forth in Universal's initial comments, we respectfully urge the Commission to adopt its proposal to eliminate third adjacent channel protections without further delay.

Respectfully submitted,

UNIVERSAL STATIONS LLC

By: /s/ William Saurer

William Saurer
President

March 8, 2019