



ASSOCIATION OF

FEDERAL COMMUNICATIONS CONSULTING ENGINEERS

WASHINGTON, D.C.

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of:)
)
Technological Advisory)
Council (TAC) Technical)
Inquiry Into Reforming)
Technical Regulations)
)

**COMMENTS OF THE
ASSOCIATION OF FEDERAL COMMUNICATIONS CONSULTING ENGINEERS
WASHINGTON, D.C.**

Honorable Commissioners,

This letter is written on behalf of the members of the Association of Federal Communications Consulting Engineers (AFCCE) and the engineers and other individuals at companies across the US regarding the technical inquiry into reforming technical regulations. AFCCE is a professional organization composed of members who provide technical, legal and other supporting roles in the communications industry to serve clients having matters under the purview of the Commission, including a significant number of members who are registered/licensed professional engineers. AFCCE has worked together with the FCC for over 60 years to provide comments, guidance, and recommendations on such topics as matters of rule interpretation, technical collaboration, and assessing impact of FCC policy and implementation suggestions.



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The FCC recently asked for comments regarding seven (7) specific items relating to changes in regulations and/or processes. AFCCE hereby comments on item three (3), regulations that should be modified.

AFCCE believes the FCC can improve its AM rules in the area of FM translator operations. Specifically, a possible adjustment in the requirement for the immediate cessation of operations for FM translators when the parent signal is turned off for maintenance and repairs. Currently, when the parent station is shut down for repairs or maintenance, the translator is required to immediately turn off. In recent times, FM translators reference FM digital sub channels which at times needs to be temporarily turned off for maintenance or to manage RF safety related to tower work. The pending TV repack will increase this activity more than normal. Adjusting this requirement to allow ongoing operation of the FM translator to be extended but in a limited fashion would help broadcasters maintain the valuable service to the community served by the FM translators. Restrictions concerning the length of time could be developed to ensure this relaxation of the rule would not be abused.

Respectfully Submitted,
Association of Federal Communications
Consulting Engineers
By

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