

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

In the matter of:

Amendment of Part 73 to permit Permanent Licensing of AM Synchronous Booster Stations))))	RM No. 11779
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COMMENTS OF GENESEE MEDIA CORPORATION

Genesee Media Corporation (“GMC”), a local broadcaster with broadcast stations in the Rochester, New York radio market, hereby submits these comments in response to the Petition for Rulemaking, Amendment of Part 73 to permit Permanent Licensing of AM Synchronous Booster Stations, RM No. 11779, dated November 29, 2016. These comments are related to the Commission’s recent actions on AM Revitalization, the 13-249 Notice of Proposed Rulemaking [NPRM] of October 31, 2013, and the succeeding First Report and Order, Notice of Proposed Rulemaking (FNPRM), and Notice of Inquiry (NOI), dated October 23, 2015. In those proceedings, the Commission solicited comments from the industry regarding specific proposals on enhancing the AM radio service.

Based on experience as an independent broadcaster in a medium size market, GMC focuses its comments on what would be real-world, realizable benefits of AM Synchronous Boosters and how it is critical to the future of the AM band. GMC, like any other broadcaster, survives through serving its communities and through advertisers wishing to sponsor this service. One of the biggest challenges in being able to compete effectively is to deliver programming effectively and efficiently to our potential audience.

Electrical noise and urban sprawl constitute two critical issues in providing reliable service to the urbanized area WOKR and WRSB are part of. Both stations employ tight directional nulls in addition to a substantial reduction in population served during the nighttime hours. This poses an acute issue in the Northeast where nighttime operating parameters intrude on half of drive time.

Some temporary relief has been given through the use of translators; however, translator coverage is not protected to the degree of a fully-licensed AM facility. Additionally, these facilities have the potential of serving a much wider area.

Under the current AM rules, the only way to rectify these issues is through employing complex directional arrays. This becomes economically unrealistic through increased regulations on antenna siting, increased land values in metro areas, and the overall cost of construction of directional antenna arrays.

The Commission's earlier 13-249 AM Revitalization actions regarding AM Revitalization actions provide proposals to set the protected daytime contour for AM radio stations to 2 mV/m. GMC believes this proposed change provides a feasible option for radio operators to increase daytime power of their facilities to compensate for electrical noise at receiving locations.

Many broadcasters came out in favor of this NFPRM as a possible method of increasing coverage. The AM Radio Preservation Alliance ("Alliance") filed comments [5] along with a set of studies showing potential issues with this approach. Most notably in the eyes of GMC is the cost aspect to increase coverage.

With a change in local service to 2mV/m, GMC's WRSB facility could upgrade its daytime signal to 30KW on an alternative frequency. This is the power level required at its site to provide a 5 mV/m signal over the core of the urbanized area it operates in. Above the hundreds of thousands of dollars required to complete the upgrade, the annual electric bill would increase over 15 times to an unsustainable level.

Further, only the daytime coverage would be improved leaving 90% of the daytime population without nighttime coverage making WRSB's signal non-competitive. Even with the relaxed RSS calculations in the NFPRM, the nighttime coverage would be insufficient into the majority of the urbanized area.

Since the 1920's when the AM service was put into commercial practice, there have been numerous technological enhancements that have not been employed. Many systems such as HD radio and C-QUAM AM Stereo required replacement radios in circulation in the general population. These proposals addressed some of the issues of the AM band although still left the issue of nighttime coverage unaddressed.

GMC is emphatically putting support behind recent comments and studies regarding Synchronous boosters and National Synchronization of AM transmission frequencies. We see this as a reasonable way to boost nighttime signals in critical areas of the service area without substantial capital outlay for complex arrays.

In this proceeding, there appears to be a consensus around reasonable engineering solutions to realistic issues plaguing the AM broadcast service. Kintronics Laboratories, Inc. ("KTL") put forward comments in 13-249 Notice of Proposed Rulemaking [3][4] providing substantial support to the revitalization efforts of the AM Service.

In their most recent filing, KTL put forward two proposals that could dramatically improve AM service in crowded metropolitan areas. [2] Further, the Association of Federal Communications Consulting Engineers ("AFCCE") put forward test results showing the tangible benefits of implementing these proposals. [1] GMC provides commentary from a perspective of a small, independent, broadcaster in voicing support in adopting these proposals.

In this proceeding, KTL proposes the following:

Proposal 1 – Immediately Open Local Synchronous Booster Stations to Permanent Licenses

Proposal 2 – Mandate Regional/National Synchronization of All AM Stations

In the case of Proposal 1, GMC sees immediate benefit in the use of synchronized transmission facilities to supplement coverage in dense areas. This would permit stations like our WRSB facility to increase nighttime coverage without substantial expense of additional broadcast towers and expensive modifications of our transmission facilities.

In the case of Proposal 2, GMC sees a case of the benefits outweighing the costs for the overall broadcast service. Like the mandated transition to CAP-based EAS and the transition to HD television, GMC sees the incremental costs to implement GPS-locked carriers as a net benefit to the entire industry and not an undue burden.

Summary:

GMC emphatically supports the adoption of synchronous booster technology and mandatory carrier synchronization for the AM Broadcast service. We believe that failure to adopt these proposals would leave the service with antiquated technical standards and unable to address the challenges of the modern communications user.

Brian P. McGlynn

President, Genesee Media Corporation

May 16, 2017

REFERENCES

- [1] Association of Federal Communications Consulting Engineers Reply Comments in FCC Proceeding 11779 on AM Synchronous boosters, RM, April 13, 2017.
- [2] Kintronic Laboratories, Inc. Reply Comments in FCC Proceeding 11779 on AM Synchronous boosters, RM, December 29, 2016.
- [3] Kintronic Laboratories, Inc. Reply Comments in FCC Proceeding 13-249 on AM Revitalization, NPRM, March 20, 2014.
- [4] Kintronic Laboratories, Inc. Reply Comments in FCC Proceeding 13-249 on AM Revitalization, FCC 15-142, FNPRM and NOI, March 21, 2016.
- [5] The AM Radio Preservation Alliance, Comments in FCC Proceeding 13-249 on AM Revitalization, NFPRM, April 4, 2016.