

## **Addendum 1: FM on Channel 6 proposal alternatives**

(In the rush to meet the deadline for submitting my Comment to the FCC **Proceeding 17-105**, I mistakenly provided an incomplete version of my proposal to revise and modernize the Commission's rules to move all U.S. AM stations to FM, including relocating most of the AM stations to an FM expanded band, on the television Channel 6 bandwidth. This Addendum addresses the need to allocate enough FM bandwidth to accommodate the thousands of AM stations to be moved.)

The primary purpose of this proposal is to move all AM stations to FM. If the channels I have suggested as 'Commercial' (Channels 171 – 180) in the FM expanded band are too few to accommodate the large number of AM stations in the larger markets and urban areas, I would then recommend the following alternatives, in the rank order, below:

**1.** If the AM station owner already owns and operates one or more full-power FM stations in the existing, non-reserved Channel 221 – 300 bandwidth, the AM station shall be moved to an HD channel (HD-2, HD-3, etc.) on one of the owned FM stations. In fact, there are already numerous instances around the country where AM station owners and operators are rebroadcasting their AM stations on one of their full-power, in-market FM stations.

If a broadcaster owns more than one AM station in the market, all of the AM stations shall first be moved to one or more FM stations in the existing, non-reserved Channel 221 – 300 bandwidth.

**2.** If a broadcaster owns more than one AM station in a market, and does not own and operate an FM station in the existing, non-reserved Channel 221 – 300 bandwidth, all of the AM stations shall operate on one FM station in the expanded band, on a channel designated as 'Commercial' (Channels 171 – 180).

**3.** If Steps 1 and 2, above, in rank order, have been implemented, and additional channels in the FM expanded band are still needed to accommodate the move of more AM stations in the market, then the next set of expanded-band channels (Channels 181 – 186), which this proposal designates for 'FM translator' use, shall, instead, be used for full-power, commercial stations.

While this proposal seeks, again, to 'clean up' the crowded, existing FM bandwidth, on non-reserved Channels 221 – 300, by also moving Low-Power FM stations and FM translators to the expanded band, the relocation of all AM stations to FM is the first priority. While most of the past 'AM-to-FM' proposals have also included using the television Channel 5 bandwidth for relocating the thousands of AM stations in the U.S., the FCC and Media Bureau have, in the recent broadcast television station 'repacking' effort, chosen to reassign some television stations to the 'Low VHF' bandwidth, which includes the Channel 5 and 6 bandwidth. As a result, this proposal is a compromise

solution which only involves using the Channel 6 bandwidth, because it is contiguous to the existing FM band, which begins at Channel 201. However, I would appeal to the FCC Chairman, Commissioners and Media Bureau management, before the television station repacking goes too far, that both the Channel 6 and Channel 5 bandwidth be considered and repurposed for use as an FM expanded band for AM station relocation.

To that end, also please find, attached, '**Table 2: Expanded FM Band Proposed Allocations, Channels 5 and 6**', which details a suggested channel assignment, in an FM expanded band, if the Channel 5 bandwidth is also included with the Channel 6 bandwidth.

**July 12, 2017**

**Robert E. Lee  
QXZ MediaWorks LLC  
Corpus Christi, Texas**