

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

In the Matter of

Modernization of Media Regulation

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MM Docket No. 17-105

**Reply Comments**

Point Broadcasting Company (“Point”)<sup>1</sup> files these Reply Comments in the above-referenced proceeding to address an issue raised in at least two sets of comments. Point supports the proposals contained in the initial comments of Mark Humphrey<sup>2</sup> and REC Networks<sup>3</sup> which each propose a change in the Commission rules to permit booster stations to rebroadcast the signal of FM translator stations as well as those of full-power FM stations. As the Commission has recently permitted LPFM stations to utilize boosters, and pursuant to the spirit of the Local Community Radio Act where translators and LPFM stations are to be accorded similar coverage opportunities, there should be no reason that FM translators should not be able to operate booster stations.

Both Humphries and REC justify their proposals on the fact that the Commission has recently allowed the use of boosters for LPFM stations,<sup>4</sup> but Point submits that there are many other contexts in which the use of boosters to rebroadcast translators is important. The most significant opportunity is in connection with AM revitalization translators. Among the many FM translators recently authorized to assist in the revitalization of the AM band, there are a number

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<sup>1</sup> Point Broadcasting Company and its various subsidiaries and affiliated companies operate over 20 AM and FM stations in California.

<sup>2</sup> See Comments of Mark D. Humphrey, MB Docket No. 17-105 (filed July 5, 2017) at page 2.

<sup>3</sup> See Comments of REC Networks, MB Docket No. 17-105 (filed June 27, 2017) (“REC Comments”).

<sup>4</sup> The REC Comments, in fact, discuss boosters principally in connection with the rebroadcast of LPFM stations and the FM translators that rebroadcast LPFM stations. REC Comments pp. 36-38.

located in areas with significant terrain obstacles where the service from FM translators can be disrupted, leaving significant portions of the AM station's service area unserved by the revitalization translator. In the mountainous terrain in the California coastal areas served by many of the Point stations, this has been a significant issue. By allowing a network of boosters to fill in the service area of an AM station by rebroadcasting the AM's cross-service translator, the FCC's mission of assisting struggling AM stations will be fostered.<sup>5</sup> A number of boosters that have been appropriately synchronized can form a single frequency network that could bring service to an AM station's entire service area.

Boosters, like translators, are secondary services, and thus they are subject to all restrictions on not causing interference to other pre-existing broadcast users, so the use of boosters will not result in any disruption to other services. Plus, as they by definition will operate on the same channel as the FM translator, the frequency on which they operate will be one that has already been determined to be available for secondary uses in the area in which the boosters will operate. The boosters will operate in areas precluded from use by other spectrum users due to co-channel interference with the translator allowing these pockets of otherwise fallow spectrum to provide service to the public. Synchronized boosters will provide an efficient use of the spectrum to amplify the programming of the primary AM station. This type of use would seem to be the ideal complement to AM revitalization translators.

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<sup>5</sup> See, e.g., *In the Matter of Revitalization of the AM Service*, First Report and Order, Further Notice of Proposed Rule Making, and Notice of Inquiry, 30 FCC Rcd 12145 (2015) (noting that "AM radio has traditionally served as a vital source of news and information, as well as a critical lifeline in times of emergencies and man-made or natural disasters;" considering proposals designed to "enhance the viability of the AM broadcast service").

For these reasons, Point respectfully requests that the Commission act on this proposal to permit boosters for the rebroadcast of FM translators serving to revitalize an AM station.

Respectfully submitted,

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