

August 4, 2018

In Re: MB 18-184

To Whom it May Concern:

My name is Fred R. Morton, CSRE. I am a broadcast technical consultant, as well as a broadcast station owner and operator. I have been involved in broadcasting since 1968. I have made numerous FCC filings, and built out new FM broadcast facilities. My ownership includes two commercial FM facilities which started out as Class A facilities and have since been successfully upgraded to higher power (one a C3, the other a C2).

After reviewing the proposal for the new "C4" category, I wanted to file comments expressing my support for the same.

The FM band is becoming more crowded, but more so, it's becoming increasingly difficult to find and secure appropriate land for new tower construction, or, in the alternative, find an existing tower site that allows required coverage of the station's COL. Add to this the huge increase in FM translators and LPFM facilities, and the band is fast approaching overcrowding. Class A FMs, typically in smaller, rural markets, need all the help they can find to overcome siting issues and continue to serve their audience and markets.

I am in full support of the MMTC and SSR Communications FM Class C4/73.215 proposal allowing eligible Zone II Class A stations to increase ERP from 6 to 12kw at 100 meters HAAT.

Please implement the MB 18-184 proposal fully without delay.

Respectfully,

Fred R. Morton, CSRE

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