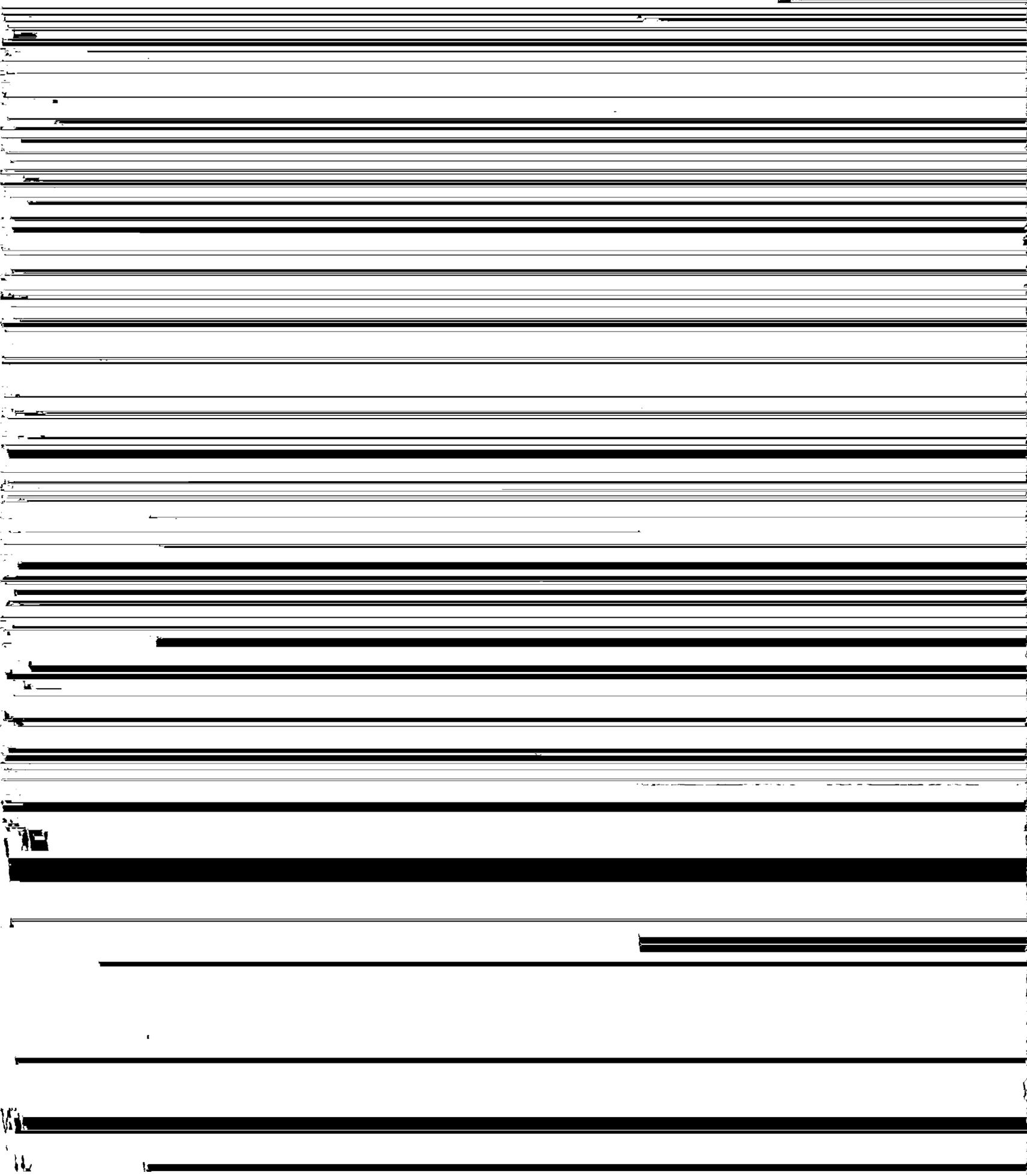


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I. Introduction and Background.

Petitioners ask the Commission to (1) review the appropriateness of the present regulations concerning AM directional antenna performance verification, given the significant environmental, technological, and economic changes that have occurred since the current policies and rules were adopted; (2) determine whether the current regulations adequately guard against interstation interference, particularly at night; and (3) consider adopting simpler and less expensive regulations for conducting directional antenna Proofs, as made possible by advances in antenna analysis methods and improvements in instrumentation technology.³

Additionally, Petitioners assert that review of the Proof rules is warranted because (1) changes in the physical environment around AM stations now make it difficult to comply with the "unobstructed" field strength measurements required by Section 73.186(a)(1);⁴ (2) using measurement procedures specified in the current rules may result in erroneous conclusions as to the actual electric field radiation of a

II. The Commission Should Review the Rules Regarding AM Directional Antenna Proof of Performance.

NAB agrees with the Petitioners that an overall review of the requirements for AM Proofs is in order. It is true that conducting a full proof of performance for an AM station is an extremely labor intensive task and often results in great expense. Full Proofs can place both financial and administrative burdens on broadcasters. NAB supports easing those burdens, but not at the expense of increased interference. In addition, advanced computer modeling techniques available to broadcast engineers can indeed be used to perform accurate analyses of antenna systems. However, thorough and accurate field measurements should be taken in order to verify any computer model.

NAB has no information which would confirm or dispute Petitioners' claim that the current rules are restrictive and act as a disincentive for equipment manufacturers and broadcasters to make technological improvements.⁶ Nonetheless, and in accordance with the Commission's efforts to improve the technical quality of AM radio, it is only logical that the FCC also explore the rules regarding AM Proofs.

III. Conclusion.

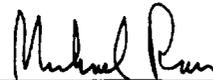
Because of the technological changes in the operation and evaluation of AM directional antennas, and due to the economic challenges faced by the AM radio

⁶ Id., ¶¶ 9,13

community, NAB believes that a review of the AM proof rules is both timely and warranted. Therefore, NAB supports Petitioners' request that the Commission open a general inquiry into the policies and rules regarding AM directional antenna performance verification. We look forward to reviewing the comments filed by interested parties in response to this Petition or in a future Commission proceeding.

Respectfully submitted,

NATIONAL ASSOCIATION OF
BROADCASTERS
1771 N Street, N.W.
Washington, D.C. 20036



Michael C. Rau
Senior Vice President,
Science and Technology



Kelly T. Williams
Staff Engineer

Barry D. Umansky
Deputy General Counsel

February 14, 1991

CERTIFICATE OF SERVICE

I, Judith L. Gerber, do hereby certify that a true and correct copy of the foregoing "Comments of the National Association of Broadcasters" was sent, via first class mail, on this date, February 14, 1991, to the following:

Ronald D. Rackley
duTreil, Lundin & Rackley, Inc.
1140 - 19th Street, N.W., 3rd Floor
Washington, DC 20036

Benjamin F. Dawson, P.E.
Hatfield & Dawson
4226 Sixth Avenue, N.W.
Seattle, WA 98107

Karl D. Lahm, P.E.
Lahm, Suffa & Cavell, Inc.
9653 Lee Highway, Suite 25
Fairfax, VA 22031

Wallace E. Johnson, P.E.
Moffet, Larson & Johnson, Inc.
5203 Leesburg Pike, Suite 800
Falls Church, VA 22041

Robert M. Silliman, P.E.
Silliman & Silliman
8121 Georgia Avenue, Suite 700
Silver Spring, MD 20910


Judith L. Gerber