



October 30, 2014

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**Via Electronic Filing**

Marlene Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

**Re: Notice of Ex Parte Communication with Adonis Hoffman, Chief of Staff and Senior Legal Advisor – Media for Commissioner Mignon Clyburn  
MB Docket No. 13-249 (Revitalization of the AM Radio Service)**

Dear Ms. Dortch:

The following meeting summary is submitted pursuant to 47 C.F.R. Section 1.1206(b)(1).

On October 28, 2014, Jeff Littlejohn, Executive Vice President - Engineering & Systems Integration, iHeartCommunications, Inc. (formerly Clear Channel Communications, Inc.) (“iHeart”), Jessica Marventano, Senior Vice President, Government Affairs, iHeart, and the undersigned, met with Adonis Hoffman, Chief of Staff and Senior Legal Advisor – Media for Commissioner Mignon Clyburn.

Mr. Littlejohn’s responsibilities at iHeart include oversight of the technical operations of iHeart’s 239 AM radio broadcast stations as well as the innovative iHeartRadio platform and the Total Traffic + Weather Network. Mr. Littlejohn’s contributions to the industry were most recently recognized by his being awarded the NAB Radio Engineering Achievement Award in 2014.

As set forth in iHeart’s Comments and Reply Comments in MB Docket No. 13-249, iHeart supports the expeditious adoption of many of the tentative proposals set forth by the Commission in its Notice of Proposed Rulemaking (“*NPRM*”) in that docket. In his meeting with Mr. Hoffman, Mr. Littlejohn emphasized the following points:

**Do No Harm.** In an industry already hampered by interference, Mr. Littlejohn asked that the Commission be guided by a “Do No Harm” principle when considering changes to

the AM band. The laws of physics that govern AM stations have not changed, thus any change in regulations that would cause increased interference would hurt a band already suffering from interference issues. Therefore, the Commission should be extremely careful in evaluating any proposals that could have the effect of increasing interference to AM listeners.

**AM-Only FM Translator Window.** Mr. Littlejohn noted that a large number of radio listeners never sample programming on the AM band, with AM listenership overall going in a downward trend. Timing is urgent in order to help the AM service. In iHeart's experience with FM translators rebroadcasting AM stations, the public has been exposed to AM programming, thereby increasing AM listening, either through the FM translator, or by the consumer tuning to the newly discovered AM signal. Moreover, the difficulty of AM signals penetrating into buildings, particularly office buildings, is a universal issue for all AM stations, which can be addressed by an associated FM translator. (Commissioner Clyburn herself noted the issue of poor AM reception in many urban areas due to structural barriers in her Statement accompanying the release of the *NPRM*.) As all AM stations face these impediments, all AM stations should have equal access and equal priority in an AM-only FM translator window that is opened quickly to address these universal needs. iHeart furthermore supports the *NPRM*'s tentative conclusions to limit the award to one FM translator per AM station in such a window, to encourage the goal of each AM station obtaining an FM translator, and to permanently link window-awarded FM translators to the original AM station, to avoid consumer confusion as to where to tune for the AM programming.

**AM All-Digital Operation.** Mr. Littlejohn noted that initial testing of AM all-digital operation (in lieu of AM hybrid mode) has shown promise for replicating analog coverage. However, Mr. Littlejohn explained that more study is required on the impact of all-digital AM operation on adjacent analog signals. Thus, while iHeart continues to support the grant of all-digital authority for AM stations on an experimental basis, it would be premature for the broad implementation of all-digital authority.

**Enforcement of Part 15 Interference Rules.** Mr. Littlejohn noted that many commenters in the AM Revitalization proceeding have called for increased enforcement of existing Commission Part 15 rules to address interference to AM signals from non-broadcast sources. iHeart supports those views, and in particular, would find valuable Commission involvement and mediation when AM stations bring to the Commission's attention interference complaints from sources such as power utilities, which often require education to resolve.

**Possible Further NPRM Matters.** The Commission's *NPRM* noted that suggestions to reduce interference protections to existing AM stations would require additional comment, research, and analysis. On this point, Mr. Littlejohn noted that a preliminary analysis of suggested proposals to reduce interference protections for Class A AM stations could result in an average of 8 million listeners per Class A station being susceptible to receiving interference.

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Likewise, changes to pre-sunrise and post-sunset authority not based on the physics of electromagnetic transmission can be expected to interfere with service to current AM audiences. Such results would be contrary to consumer expectations of continued listening. The principle of “Do No Harm” should guide the Commission in any future consideration of such proposals.

Respectfully submitted,

REPP LAW FIRM

By:   
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Marissa G. Repp

Counsel to iHeartCommunications, Inc.

cc: Adonis Hoffman (via e-mail)