

# CADENA WAPA-RADIO

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**WAPA-680-AM**  
San Juan

**WA2XPA-680-AM**  
Arecibo

**WISO-1260-AM**  
Ponce

**WI2XSO-1260-AM**  
Mayagüez

August 12 , 2011

**WI3XSO-1260-AM**  
Aguadilla

Mrs. Marlene H. Dortch, Secretary  
FEDERAL COMMUNICATIONS COMMISSION  
Office of the Secretary  
445 12th Street. S.W.  
Washington, D. C. 20554

**RE: Petition for Review of Action by Audio Division  
(1800B3-SNC, July 27, 2011)**

Wifredo G. Blanco-Pi

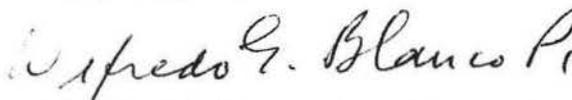
New Experimental AM, Guayama, P.R.

File Number BPEX-20090706AHD

Dear Mrs. Dortch:

Included please find in triplicate the Petition for Reconsideration/Review on Audio Division decision granting in part the original Petition for Reconsideration filed Nov.18/2009 and dismissing the application. I have been acknowledged by Ms. Susan Crawford by email that indeed we can file a petition for review based on Section 1.115 of the Commission Rules, action that must be filed before August 31, 2011. Please send back the included copy of this transmittal page stamped as RECEIVED by your Office in the pre-postaged envelope.

Very truly yours,



Eng. Wifredo G. Blanco-Pi, applicant and  
Licensee of WISO-AM

BEFORE THE FEDERAL COMMUNICATIONS COMMISSION  
Washington, D. C.

**PETITION FOR REVIEW ON PARTIAL GRANT OF PETITION FOR RECONSIDERATION AND  
AFFIRMATION OF DISMISSAL ON BPEX-20090706AHD (1800B3-SNC DATED July 27, 2011)**

**Wifredo G. Blanco-Pi**  
**New Experimental AM, Guayama, P.R.**  
**Facility Identification Number: 181037**  
**File Number BPEX-2009-0706AHD**

**AUGUST 12, 2011**

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A review/reconsideration on the Partial Grant of Petition for Reconsideration and Affirmation of Dismissal is hereby filed. **We respectfully request the Audio Division to leave without effect its affirmation of dismissal and grant the above-referenced application.**

**Background:** Audio Division decision by letter dated July 27, 2011 (1800B3-SNC) accepts the FCC staff made an error of fact when dismissing the Application on Nov. 18, 2010. Thus the petition to reconsider is granted in part after accepting that no rule prohibited an experimental AM booster to expand the main station's coverage contour. FCC's error delayed action on the Application by 16 months.

**Discussion:** The Commission unnecessarily dismisses again the application. Following you will find the errors of facts or law and misinterpretation in valid FCC policy which guarantee a positive reconsideration for the petitioner. Each point raised by the Audio Division is replied.

(1) Audio Division's letter states: " Section 74.102 of the FCC rules explicitly states that a license for an experimental broadcast station will be issued for the purposes of carrying on research and experimentation for the development and advancement of new broadcast technology, equipment, systems or service."

**R:** It is evident that the FCC has not yet made a rulemaking to regulate the use of AM synchronous boosters. So, there's is not an AM synchronous booster *service* approved or not approved by the FCC and it is still in a developmental, experimental phase. AM synchronous boosters will be in an experimentation phase until the Commission makes a formal policy on AM synchronous boosters (actual policy on boosters is contained in the Notice of Inquiry of January/87 and the MO&O 87-6.) The proposed Guayama AM synchronous booster should be considered as part of the development of a complex system and service of AM synchronous boosters which should be regulated in the near future by the FCC. The previous

experimentation made by Blanco-Pi has led to the development and advancement of the new technology and equipment necessary to operate an AM synchronous booster pair. The proposed four AM synchronous network is a system: that is "a set of things working together as an interconnected network" intended to help on the development and advancement of a new broadcast *service* that could help AM broadcasters overcome the disadvantages AM has in competing with FM stations. Experimentation with AM synchronous booster is intended to help in the development of an AM synchronous booster service.

(2) Audio Division decision states that 'based on your reported multi-year success using your existing experimental AM synchronous stations and commercially available synchronization equipment and technology, it is axiomatic that the facilities proposed in the Applications do not constitute legitimate research or experimentation, and that nothing new or groundbreaking concerning the operation of AM synchronous stations will be gleaned by permitting you to add a fourth AM synchronous transmitter to the existing WISO synchronous network:

**R:** Axiomatic : proposition regarded as being self evidently true. In working with AM synchronous boosters each proposal is unique and poses a technical challenge. As the number of AM synchronous transmitters is increased the potential interference areas can be diversified to different areas and get larger and more complex to deal in order to synchronize the audio. The proposed Guayama booster will make the experimentation even more complex. Three high power stations, two of them with directional antennas interacting with a new low power booster. Puerto Rico is a very mountainous area so conductivity is not uniform making it more difficult to get an audio delay that could make the four AM boosters experimental system work.

(3) The Commission states that: "In both the Notice of Inquiry in MM Docket No.87-6 and the 1989 MO&O the Commission discussed..." only four situations "in which use of an AM synchronous station to enhance or extend coverage of an AM station might be considered"

**R:** The Notice of Inquiry dated January 15, 1987 clearly states "the intention of the Commission to allow AM broadcast stations to use multiple synchronous transmitters to enhance and extend signal coverage **as an alternative to conventional methods, such as station power increase or antenna system redesign.**" (par. #1 lines 1-4). The Notice of Inquiry does not limit the use of AM synchronous boosters.

The MO&O 87-6 released January 13, 1989 does not impose a restriction on which ways to use an AM synchronous booster it only cites some *examples* on possible uses for AM synchronous boosters. (MO&O par. 3) In the MO&O the Commission "expresses our commitment to cooperating with the broadcast industry in exploring ways of deriving the **maximum possible benefits from transmitter synchronization technology. Accordingly, we will generally continue to authorize experimental authorizations to those AM station licensees who wish to investigate further the potential benefits of synchronous operation. (par.23, Discussion)** "Maximum possible benefits" logically includes using AM synchronous boosters to extend the

coverage of an AM station up to the limits imposed by the contours of other stations that need to be protected. That's the best use of the spectrum.

**The proceeding (MO&O) was terminated without action (par. 22) : that is the FCC did not establish any policy or rules limiting the use of AM synchronous boosters. It clearly was the intention of the FCC at that time to incentivate the use of AM synchronous booster experimentation without imposing boundaries other than protection to established stations.**

**The MO&O states in paragraph 6: "The Inquiry encouraged testing to determine the effects of two as compared to three or more synchronous transmitters"** The Commission did not specify a maximum number of AM experimental synchronous boosters to be permitted in a synchronous system under development and evaluation. When the Commission left open the quantity of licensed experimental boosters in an experimental system it is obvious that they understood the number of boosters, its relative powers, the conductivities, and many other factors complicates the experimentation and should be examined.

(4) "No claims of anomalous propagation conditions in the vicinity of Guayama were made in the Application"

**R:** The Commission is well aware of the mountainous terrain at Puerto Rico and not uniform propagation of AM signals. A topographic map was included in the application showing the extremely mountainous terrain north/northwest of Guayama, P. R. It is specified in the application that the 5 mv/m contours of WISO and the proposed new AM booster for Guayama will meet at Salinas, P.R. which is close to the seacoast valley. (Salinas is a municipality having more than 30,000 people).

From a glance at the Puerto Rico topographic/roads map it is easily detectable that from Salinas up the interference area between both synchronous transmitters should maintain for at least 12 km. since a major toll-highway (second most important toll-highway) goes perpendicular and up from Salinas. (map included) Main and booster signals should maintain in more or less the same ratio while decreasing North. Thus, a complex interference area to be audio-synchronized has to be worked out because while heading North the mountains chain on top of Guayama make inconsistent the signal coming from the Guayama transmitter. Nobody can predict axiomatically what has to be done to make this synchronous pair work. Perhaps the power of the booster has to be modified to move the interference area to the East or perhaps not. That is to be determined. The only way to do it, is installing the booster and experimenting with it. After synchronizing audio at the main interference area: along road PR-52 we would have to evaluate what happens outside this main toll-road at cities nearby.

It's necessary to evaluate too how interaction of WISO, W12XSO, W13XSO and the proposed Guayama booster would behave at other places at the center of the Island.

It's a matter of record within the FCC the difficulties we have encountered in our twenty years