

of experience with AM boosters in Puerto Rico with not uniform conductivity and mountains effects on synchronous boosters. If no large chain of mountains or poor conductivity would exist between our station in 680Khz in San Juan, P. R. (10KW ND, Daytime) and/or the 2.5 KW on 1260Khz., from Ponce should be enough to have a good signal over Guayama. That's not the reality: poor conductivity, man made and nature noises that greatly affect AM make the signal over Guayama insufficient.

FM stations are permitted multiple boosters because mountains limit coverage in some azimuths. Why permit FM stations to fill in their gaps in ideal coverage with boosters and translators and being so hard on AM stations? Is it because evaluating an AM directional antenna or an AM synchronous booster is harder or more time consuming?

**The fourth 1260 Khz. AM synchronized transmitter in Puerto Rico makes the most efficient use of the spectrum possible permitting WISO 1260Khz. signal to extend continuously in every direction possible but maintaining the protection to all U.S. and Internationally protected stations.**

**To allocate the station nighttime the applicant proposed lowering the nighttime power of the main station WISO (from 2.5KW to 2.0KW/night) in a contingent application which was already granted by the FCC (BP-20090611AAD). The CP WILL EXPIRE ON 12/03/2012.**

(5). Audio Division's July 27, 2011 letter alleges that there are currently four radio stations licensed to Guayama, two AM and two FM as a point to dismiss the application.

**R:** Really Guayama is served with one full time AM station (1590) and one DAYTIME ONLY AM station (1540) both 1kw. in power. The FCC uses arbitrarily and discriminatorily this fact to , granted to WBZT-AM (1kw at West Palm Beach) a license to operate an experimental synchronous booster at Pompano Beach (0.8Kw). Pompano Beach has a population of 99,845 persons (more or less the same population at West Palm Beach). The FCC licensed an experimental AM synchronous booster for Pompano Beach which is licensed TWO FULL TIME AND HIGH POWERED AM stations: WWNN 1470 (50Kw Day/2.5kw Night) and WHSR 980 (5.0Kw. Day/2.2 Kw Night) and one high power FM: WMXJ-FM (62.6kw). The main and booster stations for WBZT are 35 miles apart. WISO-AM and the proposed booster at Guayama are too exactly 35 miles apart.

It is a fact too that both AM stations licensed to Guayama, P. R., WIBS and WXRf are owned by the same entity, INTERNATIONAL BROADCASTING CORPORATION. The FCC is intended to regulate broadcast communications mainly from a technical point of view and shall not in any way give the appearance of protecting a corporation that owns the two AM stations licensed to Guayama from another media trying to improve its coverage in that area. The FCC shall promote free competition and nothing that would appear as a monopoly in the AM service to Guayama.

Another fact to consider is the municipality of Arroyo, which is part of the Guayama Metropolitan Area, having a population of 20,000 people. Arroyo does not have any AM or FM station and is just 3.5 miles away from the Guayama booster transmitter site and with completely sea water conductivity in its path. So, the 1260KHz. experimental booster at Guayama will serve with city grade signal all of Arroyo permitting this town shielded by a large mountain chain North of it to receive a good news and information signal especially on heavy rain and hurricanes which often flood large areas of Guayama and Arroyo.

(6). Audio Division July 27 letter dismissing in part the application pretends to require WISO to use conventional methods for AM station coverage improvement alleging that WISO is a non-directional station.

The precedents established by prior FCC decisions clearly establish it's a discriminatory ruling to apply it now when: (a) the FCC granted WI2XSO and WI3XSO to WISO (which has always been a non-directional station) (b) the FCC granted WA2XPA to WAPA (a 10KW non-directional station) The nighttime directional antenna at WAPA was installed to allocate the Arecibo booster (c) the FCC granted an experimental Booster at Pompano Beach, Florida to WBZT (West Palm Beach) being the main station a 1kw. non-directional station with excellent conductivity along the Florida sea coast.

Again, the 1987 Inquiry specifies the desire of the FCC to "allowing 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." That policy has not been altered officially. The MO&O (1989) states "we will generally authorize experimental authorizations to those AM station licensees who wish to investigate further the potential benefits of synchronous operation". No rulemaking restrictions were made since the proceeding was terminated without action.

(7). As you correctly cite: "The Commission has not created an AM synchronous service nor specify any technical rules or policies governing the operation of an experimental synchronous station therein." But it can't be used to dismiss an experimental booster application.

**R:** The governing FCC policy at the moment is the one expressed in the Inquiry and the MO&O 87-6. That is:

(a) "our (FCC) commitment to cooperating with the broadcast industry in exploring ways of deriving the maximum possible benefits from transmitter synchronization technology...

(b) We will generally continue to authorize experimental authorizations to those AM station licensees who wish to investigate further the potential benefits of synchronous operation."

(c) The Inquiry encouraged testing to determine the effects of two as compared to three or

more synchronous transmitters.

(d) If a change in policy is intended it shall not be retroactive and shall be widely notified by the FCC officially. Based on the authorized precedents, on the Inquiry, and the MO&O the applicant purchased the land, made all the necessary studies, acquired all the necessary local permits to install the Guayama booster, an investments exceeding a hundred thousand dollars (\$100,000.00). The applicant has been granted the required permits from the following local and US agencies: Department of Natural Resources, U.S. Fish and Wildlife, PR's Telecommunications Regulation Board, Arecibo National Observatory, Municipality of Guayama Planning Office, PR Environmental Quality Board, PR Electric Power Authority, PR Sewer and Aqueduct Agency, FCC Tower Registration (FAA not required). The Commission grants a one year period (non-renewable) to construct an experimental booster so it's imperative to have readily available the site to construct as well as all the local permits to begin construction at the moment a CP is granted.

(8). Audio Division alleges that there has been little public interest in AM synchronous transmission, with the Commission receiving and granting only a small number of requests for experimental authorizations for AM synchronous booster stations.

**R:** The FCC has shown no interest in divulging the success of AM synchronous boosters, as vastly notified by Blanco-Pi on several reports. Searching the FCC internet site for information on AM synchronous boosters you will not find any information that could motivate other broadcasters to get involved in experimentation with AM synchronous boosters. If the FCC wanted to motivate people to get involved it could have done it making easily available all the information generated by our experimentation but did not do it. Puerto Rico is an island and continental broadcasters not necessarily have easy access to listen to our synchronous boosters "showroom". We accept that all the data and information recollected in the experimentation process was filed at the FCC as it was required in the licenses granted to us but I though it was the prerogative of the FCC to divulge it or not. We have been always in position to cooperate with the FCC to make a rulemaking on AM boosters. If the FCC suggests to make a a formal petition on making a prospective rulemaking on AM synchronous boosters we are anxious and readily available to do it.

**Conclusion:** THE FCC is created to be a "*responsive, efficient and effective agency capable of facing the technological and economical oportunities of the new millenium... promoting competition and innovation ...encouraging the best use of the spectrum domestically and internationally....revising media regulations so that new technologies flourish*". Expanding the use of a frequency (Ex. 1260Khz. in Puerto Rico) without causing interference to other stations domestically or internationally, expanding AM synchronous booster experimentation, and promoting use of that technology is consistent with U.S. intention to create the FCC "to strengthen the defense of the nations communication infraestructure". I am merely the actual operator of a media network that is really part of the U.S. communications

infraestructure and of its patrimony.

CQUAM AM STEREO, (FCC APPROVED) DID NOT WORK. AM HD TRANSMISSION (FCC APPROVED) does not work either. A station with more than 25mv/m would have annoyin intermittent digital audio with continued switching between digital and analog on car radios. The only way to guarantee AM will be tuned by listeners is to have an analog signal of much more than five mv/m over a populated city. AM synchronous boosters solve this problem. Why does the Commission want to discourage AM synchronous boosters from being widespread?

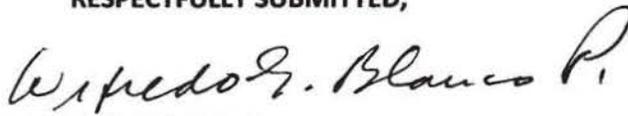
The fourth AM synchronous booster at Guayama, part of the WISO synchronous experimental system, is indispensable, to fail-proof test the use of experimental synchronous boosters. Isn't it logical to permit a pair of two electrical engineers that have dedicated more than 20 years of their lives to make AM synchronous boosters work to conclude their experimentation? (Don't worry no other AM synchronous booster can be applied for on 680Khz. nor on 1260Khz. We have used at maximum the capabilities of these two frequencies in Puerto Rico.)

**Requested Action:** As it was unfair waiting 18 months for the Commission to correct the staff error made when dismissing as unacceptable for filing the application on November 18, 2010, it is equally unfair to wait several months more for a solution to a new unnecessary and unsustainable dismissal.

The applicant has concisely and plainly stated the questions presented for review with the appropriate references to the findings of fact and conclusions of law. The dismissal action taken by the Audio Division of the referenced application is in conflict with the statutes, regulations, case precedents and established Commission policy as explained in this petition to review making reference to the corresponding section of the July 27, 2011 dismissal letter.

**WE RESPECTFULLY, REQUEST THAT THE COMMISSION SETS ASIDE THE DISMISSAL MADE ON ITS JULY 27, 2011 LETTER . THE COMMISSION CAN ON ITS OWN MOTION SET ASIDE THE DISMISSAL TO THE APPLICATION MADE ON ITS JULY 27, 2011 ACCORDING TO 1.108 CONSIDERING UNNECESSARY TO AGGRIEVE THE APPLICANT ANY FURTHER. ALTERNATELY, WE RESPECTFULLY REQUEST THAT THE COMMISSION CONSIDER THIS PETITION TO REVIEW AND GRANT THE NEW GUAYAMA AM SYNCHRONOUS BOOSTER APPLICATION.**

RESPECTFULLY SUBMITTED,



ENG. WIFREDO G. BLANCO PI  
APPLICANT/PETITIONER

AUGUST 12, 2011

