



August 28, 2015

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: **Revitalization of the AM Radio Service, MB Docket No. 13-249,  
Notice of *Ex Parte* Communication**

Dear Ms. Dortch:

On August 26, 2015, the following AM radio broadcasters and the undersigned of the National Association of Broadcasters met with Commissioner Pai and his Acting Advisor Alison Nemeth, Commissioner O’Rielly, and Commissioner Rosenworcel’s Legal Advisor Johanna Thomas, to discuss the above-captioned proceeding:

Steve Callahan, WVBF-AM, Middleborough, MA;  
Dennis Carpenter, KASM-1150AM, Ramsey, MN;  
Neil Lipetzky, KAYL-AM, Storm Lake, IA and KSOU-AM, Sioux City, IA;  
Tom McAuliffe II, WMRC 1490AM, Milford, MA; and  
Alan Quarnstrom, WBHA-1190AM, Wabasha, MN and KCUE-1250AM, Red Wing, MN.

The broadcasters described the crucial role they play in their small and mid-sized communities. Indeed, several are the only source for local news, public affairs and emergency information, as well as in-language content for non-English speakers. However, they also expressed concerns about the future of their stations. The broadcasters described how an increasing noise floor and FCC rules that limit their nighttime operations are causing listeners to flee to higher fidelity alternatives, along with advertisers. They also noted that these challenges threaten not only their stations, but the entire AM radio service. One attendee even discussed his reluctance to allow his children to join the family business because the outlook for AM radio is so dire.

The broadcasters stated that the best lifeline the FCC could provide is an application window for FM translators that is limited to AM stations. An FM translator would allow them to rebroadcast their AM programming on the FM band, reaching a larger audience with a clearer signal, and potentially bolster their economic footing. Unfortunately, like thousands of other AM stations, the broadcasters have no way to obtain a translator because none are available in their area, and the rare translator that is made available is usually sold to much larger and powerful stations for prices far out of their reach. The attendees also noted that

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translator prices skyrocketed even more following the Chairman's blog in April, well beyond the means of most AM radio stations located in small and mid-sized markets.

The broadcasters clarified that there is simply no reasonable alternative to a translator application window that is limited to AM radio stations. For example, the reported waiver process that would allow AM stations to obtain and relocate a translator up to 250 miles will do nothing to improve their small-market situation, or that of the majority of AM broadcasters. To the contrary, they explained that such an approach would only expand the universe of well-funded stations in large markets they would have to compete against in a bidding war for a translator.

The broadcasters thus asked the FCC Commissioners and staff to support an AM-only application window for FM translators as the only way they will ever be able to obtain a translator, and because it is the best and only realistic approach that will actually help revitalize the entire AM radio service.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Larry A. Walke". The signature is fluid and cursive, with the first name "Larry" being the most prominent.

Larry Walke  
Associate General Counsel  
Legal and Regulatory Affairs  
National Association of Broadcasters

cc: Commissioners Rosenworcel, Pai, and O'Rielly  
Johanna Thompson  
Alison Nemeth