



September 29, 2015

Marlene H. Dortch, Esq.  
Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington DC 20554

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

Dear Ms. Dortch:

On September 25, 2015, David Honig, President Emeritus and Senior Advisor, Multicultural Media, Telecom and Internet Council (MMTC), James L. Winston, President, National Association of Black Owned Broadcasters, Inc. (NABOB), Francisco Montero of Fletcher, Heald and Hildreth, PLC and the undersigned of the National Association of Broadcasters (collectively "Radio Broadcasters") had a teleconference with Chanelle Hardy, Chief of Staff to Commissioner Mignon Clyburn. We discussed the importance of including an AM-only window for FM translators as part of the Commission's effort to revitalize AM radio.

Consistent with our prior comments in the docket, Radio Broadcasters made clear the importance of the Commission following through with Commissioner Clyburn's signature proposal in 2013 to conduct an exclusive window for AM stations to obtain FM translators. This approach is essential to ensure that all radio stations, small and large, have a meaningful opportunity to gain access to translators and frequencies in order to continue to serve their local communities. Any other proposal – including the 250-mile proposal currently on circulation – is incomplete without the window previously proposed and virtually unopposed in the record in this proceeding.

Radio Broadcasters also recounted how the Commission has already had similar exclusive windows for FM stations and LPFM stations. It would be fundamentally unfair to exclude AM stations from this opportunity to improve their service to their local areas. No other medium – not cable, satellite, wireless or wireline broadband – endeavor to serve their local communities in any manner close to how broadcasters do. In this instance, AM stations are looking for an opportunity to have their signal reach their communities of license in an age where there are so many devices that interfere with basic AM service. Following through on

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Commissioner Clyburn's original proposal is the best avenue to achieving a meaningful AM service for American consumers.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Rick Kaplan", with a long horizontal line extending to the right from the end of the signature.

Rick Kaplan  
General Counsel and Executive Vice President  
Legal and Regulatory Affairs