

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of )  
 )  
 ) MB Docket No. 13-249  
Revitalization of the AM Radio Service )

FIRST REPORT AND ORDER, FURTHER NOTICE OF PROPOSED RULE MAKING, and NOTICE OF INQUIRY

COMMENTS OF CTC Media Group, Inc. New Bern, NC

As the owners and operators of small market AM radio stations in Eastern North Carolina, we wish to express our appreciation to the Commission’s staff on the renewed focus and carefully deliberation that has been directed to the task of revitalizing the AM radio service. Every day our company, along with the many other hundreds of fellow small town broadcasters, performs a vital benefit to the communities we all serve. We provide a reassuring outlet for local expression and information, not to mention our critical service in times of emergency as a reliable source of up-to-date information (sometimes the *only* available source) to our listeners.

On the whole, we strongly support the proposed this R&O and believe that while there will be continuing challenges for the small market broadcast owners, this proposal-- if implemented-- will have a net positive effect for the broadcast industry.

With specific regard to the proposal at hand, we suggest some “minor changes” or “clarification” of the overall recommendations that we believe to be completely consistent with the spirit of the Revitalization R&O and will result in a better framework for the upcoming proposed modification and auction windows.

The Commission’s proposal is to provide *“The first FM translator auction window, as with the initial modification window, shall be limited to Class C and D AM permittees and licensees that have not participated in either modification window. Again, as discussed above with relation to the modification windows, we find that the lower powered and/or service-limited Class C and D AM broadcasters are most in need of the service enhancement a cross-service translator can provide, and therefore should receive the first opportunity to apply for one”*.<sup>1</sup>

While we fully concur with this specific proposal, we respectfully request that the Commission expand their modification and auction windows to also include Class B AM stations which currently operate with nighttime coverage and have very small nighttime interference service areas that are either comparable or smaller than a Class C station. A provision for including lower

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<sup>1</sup> FCC 15-142 ¶17

powered Class B in the first round might be established by criteria such as (1) nighttime service area falls below a nominal Class C service area, (2) extremely high nighttime interference limit or (3) maximum power 500 watts.

The Commission's proposal to revise protection requirements for daytime contours begins to address the ever-increasing level of RF noise in the AM broadcast band. A perhaps unintentional byproduct of these proposed rules is that it will result in a significant *reduction* in the flexibility for an existing AM station to make a channel change under existing "minor change rules". Not only will the number of channels for change will be impacted (based on the proposed dismissal of the former "ratchet rule" and second adjacent channel considerations), but the distances impacted will be greatly reduced due to primary daytime AM radio service "goalpost" being moved from 0.5 mV/m to a 2.0 mV/m primary service threshold.

Therefore, we respectfully request a relaxation of the minor change rules criterial for all existing AM stations to provide for *a move to any AM channel within the band*<sup>2</sup> as long as the proposed facility continues to provide service to a significant amount of the current service area (possibly in the range  $\geq 75\%$ ). This will permit broadcasters to fully capitalize on upgrading their facilities to take full benefits of the expanded latitude offered by the increase in the AM signal standards. It will also afford the opportunity to relocate to spectrum previously vacated by legacy, now-defunct assignments<sup>3</sup>.

Respectfully submitted,

Lee Afflerbach, P.E.  
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<sup>2</sup> Exclusive of the expanded band and 1590 & 1600 kHz

<sup>3</sup> Stations that have new spectrum assignments or that have been deleted