

Date: February 10, 2016

To: Federal Communications Commission
Office Of The Secretary
Washington, DC 20554
Electronic filing to: <http://fjallfoss.fcc.gov/ecfs2/>

From: Anthony G. (Tony) Coloff
Managing Member
Sturgis Falls Broadcasting, LLC
Licensee of Standard Band Station KCFI AM 1250
and licensee of Expanded Band Station KCNZ AM 1650
721 Shirley Street
Cedar Falls, Iowa 50613
641-585-1073

Regarding: FCC Order on Revitalization Of The AM Radio Service
Released October 23, 2015
Reply Comment Date: 60 days after date of publication in the Federal Register
(March 21, 2016)

Docket Number: MB Docket No. 13-249

Comment On Proposed Rules:

Items 14-15: Require surrender of licenses by dual Expanded band/Standard band licensees;

Comment supporting: Supporting comments below in favor of licensee retention of dual authorizations; and regarding the effect of such retention of dual authorizations on the AM service.

Comments:

Licensee is in favor of licensee retention of dual authorizations for the following reasons:

- 1 *In 1991, The Commission adopted rules licensing AM Stations in the AM expanded band.

- 2 *In 1998, Licensee of AM Standard Band station KCFI-AM-1250, in good faith, invested in construction of Expanded Band station KCNZ-AM-1650 which greatly improved AM service to City of license, Cedar Falls, Iowa.

- 3*In 1996, the Commission again changed the rules with the adoption of the 1996 Telecommunications Act, to allow owners to own, 2 or more stations in the same market.
The rule specifically is 73.3555 addressing multiple ownership: in item iii, it states that in a radio market with between 15 and 29 (inclusive) full-power, commercial and non-commercial radio stations, not more than 6 commercial radio stations can be owned in total, and not more than 4 commercial stations in the same service (AM or FM).

- 4 *From 1998 to 2010, Licensee then, again in good faith, invested in various programming experiments on Standard AM Band Station KCFI-AM-1250 to develop programming for minorities and other underserved audience segments, and after several years of investing in trial and error programming attempts that ended in failures, the program experimentation finally resulted in the successful development of programming for a smaller audience segment in a nearby community that had no first time radio service.
That community, Hudson, Iowa, has been designated as the city of license. This was done in the spirit of self AM revitalization; and also to further the goal in that 1st time AM radio service for a community, was better than NO radio service at all for that community.

- 5 *In 2013, the self AM revitalization program embarked on by the Licensee for improved program service on the standard band station was further invested in by the Licensee, and the standard band station was further improved, by adding a greatly improved technical improvement, by adding an FM translator to simulcast and rebroadcast the AM standard band station KCFI-AM-1250.

- 6 *KCFI AM 1250 Standard band station interference to be eliminated.
In 1991, the commission's intent was to remove interference in the Standard AM Band from the AM stations that most significantly contributed to congestion and interference in the standard AM Band, and provide those stations with more robust, interference-free service in the Expanded Band. That goal was accomplished with KCNZ AM 1650.

In 2016, with the commissions new current intent of the Revitalization of the AM Radio Service, Standard Band Station KCFI-AM-1250 proposes to join the commission in the elimination of interference, as well as join in the new AM revitalization effort.

We hereby propose the following:

- 1 We are in favor of licensee retention of dual authorizations, in order to retain established KCFI-AM-1250, 1st time AM Radio service with FM translator fill in service, to new city of license Hudson, Iowa.
- 2 We would join the number of stations still holding dual standard band/expanded band authorizations in filing requests for waiver to the surrender condition and prohibition against sale of one of the authorizations.
- 3 To further pursue the commissions goal of revitalizing the AM Radio Service, and at the same time further removing congestion and interference from the Standard AM Band, we would propose that Standard Band Station KCFI-AM-1250, be given the opportunity for a period of time to fully utilize and reengineer under the commission's new AM technical revitalization rules, to rebuild and/or remove and rebuild at the present location, or relocate and build at a new location, with a new tower and transmitter, and if necessary, new power level, to retain established service while at the same time removing objectionable congestion and interference.

Closing comments and requests:

For the above reasons:

- 1 We are in favor of licensee retention of dual authorizations;
- 2 As a licensee that still holds dual standard band/Expanded band authorizations, we would be in favor of and would request a waiver of the surrender condition and prohibition against the sale of one of the authorizations, as we have made much investment in the facilities of both AM stations.
- 3 We would be in favor of allowing Standard Band Station KCFI-AM-1250 the opportunity to utilize the commission's coming new AM technical revitalization rules, in order to retain established service rather than eliminate it, while at the same time removing objectionable congestion and interference from the Standard AM Band.

Signed: Anthony G. (Tony) Coloff
Managing Member
Sturgis Falls Broadcasting, LLC
Licensee of Standard Band Station KCFI-AM-1250
and licensee of Expanded Band Station KCNZ-AM-1650
721 Shirley Street
Cedar Falls, Iowa 50610
641-585-1073