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Federal Communications Commission
Office of the Secretary

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February 23, 2016

Before the Federal Communications Commission
Washington, DC 20554

In the Matter of

Revitalization of the AM Radio Service

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MB Docket No. 13-249

This is a comment regarding the NPRM #13-249 regarding the "Revitalization of the AM Radio Service". This comment is from Brian Winnekins, Licensee of WRDN-1430AM in Durand, WI.

First I would like to say thank you to the Commission for passing the first round of changes to help with the revitalization of the AM Radio Service. I would especially like to thank the Commission for recognizing the need for some additional changes and asking for some comments on possible changes to the night time service.

In the first wave of changes, the Commission acknowledged the possibility that local service would be of more value than the ability of long distance listening. I agree, but also understand that there is a segment of the public that enjoys long distance listening. I would like to submit to the Commission a compromise. Many smaller stations like WRDN are located in small, rural communities. One way many of those stations could generate additional revenue is by broadcasting their local high school sports teams, but fail to do so because of the low power restrictions at night. My suggestion is have a post-sunset authority for 500 watts until 10pm LOCAL time. This would be similar to the pre-sunrise authority many stations already have at 6am. I believe by doing this, it will improve service to the local community, provide a possible revenue stream for stations while at the same time allowing for "long distance" listening during the overnight hours. This would be the easiest thing the commission could do as it would not require a huge investment into equipment and engineering like we are seeing with the new rules regarding moving an FM Translator 250 miles.

While there have been many who disagree with changing the Class A protection, there are two points I would like to submit. First, if the Commission is not able or willing to find a way to reduce the man-made interference, the ability to even listen to a Class A in a community is next to impossible unless that person is located within 50-100 miles from the station, so having protection out to 600 miles seems unreasonable. Second, those whom say the Class A's need protection because of emergency information, then the Commission should REQUIRE the Class A's to have EVERY COUNTY as part of their EAS system in their area of current night-time protection everyday, not just during a well publicized hurricane or storm. The comment of, "thats impractical and thats what the local stations are for", means that the Class A's no longer are needed for emergency information or the Class A's are just unwilling to provide it to area's outside of their local area and thus should not be entitled to skywave protection at night that prevents local stations from broadcasting emergency information to their communities and counties they serve.

Another topic the Commission has asked for comments on is the use of the expanded band. First I believe that those legacy stations that moved to the expanded band back in the 90's should have to turn off

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and turn in the license for either the expanded band signal or the legacy band signal. The point of the expanded band was to reduce interference and by having both signals that has not happened. I also believe there should be more stations allowed on the expanded band. Again the same rules should apply that the legacy license should be turned in, but not in three years after sign on, but right away once the move to the expanded band is completed. This will give stations still on the legacy band the possibility to improve service at night. If given the chance, I would consider moving from 1430 to the expanded band as I believe it would improve my nighttime and daytime service.

In regards to daytime service. I would also support having some changes to that. Because of the increased man-made interference, along with ground conductivity maps from the 1920's that may be inaccurate, it seems reasonable to allow for some changes to let stations increase their daytime power. For our station, it would mean better service for the Mondovi, WI and Wabasha, MN areas, so I support this suggestion.

Finally, I would like to also offer the following suggestions to help improve AM service:

1. I would like to see the Commission begin to enforce the Part 15 interference rules for consumer electronics. We are starting to see more interference from the new compact florescent lightbulbs, computer monitors, power adapters and even new TV's. I understand that this will be hard to enforce products that are already in homes across the country, but I feel the Commission needs to get this under control.
2. Moving back Pre-Sunrise Authorization to 5am. With the 24-7 world we live in now, I believe many AM Station like ours are at a disadvantage because we are not allowed some decent power at a very critical time of the day.
3. Expand the broadcast bandwidth. We believe the current NRSC Standards, coupled with low cost radio receiver have made the AM Band difficult to listen to. If the bandwidth could be returned to 15kHz and the radio manufacturers will allow more bandwidth to be received it could improve some reception quality and attract new listeners. At the same time, it would be wise to require no more than 100% peak modulation so we don't return to the days of the modulation wars from the 70's and 80's.
4. Encourage the radio manufacturers to produce a better product. While I understand the Commission has no authority to force radio manufacturers to produce radio receivers to a specific quality, I would hope the Commission could at least work with radio manufacturers to come up with some basic standards for receivers.
5. Testing of other digital platforms. While there has been a full digital test of IBOC on the band, I believe there should also be tests of DRM and other digital platforms. I feel the Commission should encourage these tests and allow broadcast engineers to examine the results and also try possible solutions to work through the current issues with IBOC and other digital platforms.

I would like to thank the Commission for reading our comments and continuing to look for ways to improve the AM Broadcast Band.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian Winnekins".

Brian Winnekins

WRDN Radio