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Ref FCC 15-142 First report and Further Notice

February 24, 2016

MB Docket 13-249 Dated October 21st, 2015

Comments on Proposed Rule Making

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Dear Sirs:

This letter is in response to your "First Report and Further Notice of Proposed Rule Making and Notice of Inquiry" released in October 2015, specifically Section IV as it relates to Proposed Rule Making Subsections A and B. As the operator of 1510 WMEX a Class B AM station located in the Boston market, the struggle and issues of AM radio in this era of changing technology are very apparent every day. Specifically I am commenting on para 49, reduction or elimination of Nighttime and critical hours protection, and para 63 Daytime protection increasing signal to overcome environmental noise. Both these steps are strongly supported as they would significantly enhance the ability of stations to survive economically and just as importantly provide better service to the public in our broadcast area.

I would like to start by going back to The Communications Act of 1934 and the stated mission of the FCC "to make available to all the people of the United States radio and communication services." This is a public charge to serve the community, which is a critical part of each license. In addition to the long-existing issues of limited Night time and critical hours, day time environmental signal interference, (a growing issue in today's world), AM stations now struggle with the 2002 adoption of NRSC-5 digital HD AM signals. The unintended result of this is to further degrade our signal and range, para 63 would assist in service in this area.

As of today, in many ways WMEX is unable to properly serve its market area. (Boston metro in a 40 Mile radius is essentially the definition). The adjustments as proposed would go far in allowing us to serve the community of Boston, from the workplace to the home. There are hundreds of thousands of local listeners whose communications access is severely impinged by the limited and twisted signal pattern we now use. On the Clear channel side, presently, with Internet, Sirius, etc. the loss of service to the public for someone outside the local service area of WRAL 1510 Nashville (of perhaps 200 miles radius) is minimal, while on the other hand, the improved overall service to the local "community", or the greater good as the FCC has been charged in para 1 of its Mission Statement, and as the Station is charged in its grant of license, is clear.

As a new radio station owner I will be impolitic and raise the biggest issue, the real monster in the box. That is, of course, revitalization, or more literally the survival of broadcast AM radio, and the jobs it furnishes to its local communities. (As a new endeavor, we currently employ 9 full-time staff, and

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THE CONVERSATION STARTS HERE
**BOSTON WMEX
1510 AM**

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5-7 part-time staff, and hope to create more jobs as we become established). One must admit, the world is changing, at WMEX we are investing in web broadcast, website improvements, blogs and the future. One of the largest issues of terrestrial radio is cost, a significant point to be made here is that the removal and relaxation of the standards as proposed above, along with the previously approved "Antenna Efficiency Standards" will have a significant economic effect for a Class B station in a market like Boston. The management of a massive rhombus of 4 antennas, pattern, signal management and engineering, citing issues based on today's rules add well over USD 125,000 per year to operating costs. (Estimated savings for engineering, tower maintenance and siting flexibility.) This is not a small number for a station on the upper end of the AM dial. Additionally, our ability to properly serve the market based on a strange engineering map has an economic effect in other non-engineering areas. Very honestly, it is a matter of basic survival.

Before I close I would like to quote para 8 of the FCC "Best Practices for National Spectrum Management". Essentially it looks at encouraging and allowing "evolution of services and technologies", "eliminating regulatory barriers", "encouraging efficiency in the use of the spectrum by reducing or removing unnecessary restrictions". All the above are served here in the opinion of the writer.

We very much appreciate your studied and careful consideration of these changes. The world has clearly evolved from the old clear channel community of 1934, listening to AM stations a thousand miles away. Honestly, I am in my 60's and remember the head sets and listening to scratchy, static radio at night; that world is gone. We strongly believe that the adoption of these steps as proposed will go far to help ensure the survival, and regrowth of (especially) Class B AM stations in markets like Boston. Furthermore, these changes will allow us to serve our community from the home through the workplace, helping to fulfill the FCC's community service charge, while not onerously impinging on listeners in the non-service community, and maintaining jobs. The critical nature of these changes cannot be overemphasized.

Best Regards



Henry J. Remmer, JD

Member/CEO

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Db a 1510 WMEX AM, Boston