

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554**

In re:	§	
	§	
Revitalization of the AM Radio Service	§	MB Docket No. 13-249
	§	
Notice of Inquiry	§	

To the Commission:

Comments of Blount Masscom, Inc., et al

Blount Masscom, Inc., K.W. Dolmar Broadcasting Co., Inc., Blount Communications of NH, Inc., and Blount Communications, Inc. (collectively “Blount”), through undersigned counsel, hereby files comments in response to the Commission’s further *Notice of Inquiry* and *Further Notice of Proposed Rulemaking*¹ dated October 23, 2015. Blount, through its various companies, is the licensee of five (5) AM stations providing coverage throughout New England.² Blount’s AM stations have served the local communities with important programming, including emergency and weather information dating back to 1978.

I. Blount continues to strongly support relaxed main studio rules for AM stations.

In its prior comments to the Commission on AM revitalization, Blount argued that the Commission should immediately begin to grant waivers of the main studio rules for certain AM stations to provide significant and much needed financial relief to AM broadcasters. The

¹ *First Report and Order, Further Notice of Proposed Rulemaking and Notice of Inquiry*, 30 FCC Rcd 12145 (2015). These comments are timely as they are filed before the March 21, 2016 deadline as set forth in the Federal Register, 81 FR 2818 (Jan. 19, 2016).

² WARV(AM), Warwick, Rhode Island, licensed to Blount Communications, Inc.; WFIF(AM), Milford, Connecticut, licensed to K.W. Dolmar Broadcasting Co., Inc.; WVNE(AM), Leicester, Massachusetts, licensed to Blount Masscom, Inc.; WDER(AM), Derry, New Hampshire, licensed to Blount Communications of NH, Inc.; and WSDK(AM), Bloomfield, Connecticut, licensed to Blount Masscom, Inc.

Commission has now taken up the question in the *Notice of Inquiry* and seeks further comment on whether to allow for relaxation of the rules, how to go about doing so and relaxation of the staffing requirements.

Blount continues to strongly believe that relaxation of the main studio requirement for AM stations is vital and necessary to the continued longevity of AM radio. Monies that would otherwise be devoted to the maintenance of an expensive main studio can be diverted to other more critical areas resulting in better overall service to the local community. In this respect, commercial AM stations are not so different from non-commercial educational stations in needing to keep expenditures low just to remain viable and operating. Indeed, a typical NCE main studio waiver request focuses mostly on the cost savings of allowing the consolidation of main studios to one or two sources rather than having multiple outlets. The consolidation of the main studio also has the advantage of limiting the number of employees that are required as well since only one location needs to be staffed rather than multiple ones.

In the *Notice of Inquiry*, the Commission requested comment on how a relaxation of the main studio rule for AM stations should be implemented. Blount agrees that the current system of waivers that are evaluated on a case-by-case basis should be retained,³ and that AM commercial stations should be given the same consideration currently given to NCE stations seeking a main studio waiver. Specifically, NCE waiver requests are routinely granted provided the applicant agrees to maintain some contact with the local community through community members and a 1-800 or other toll-free phone number that allows citizens to contact the licensee⁴. Commercial AM stations seeking waivers of the main studio rule should be given the

³ This approach is also attractive as it does not require any modification of the main studio rule as it is currently written, which already technically allows waiver requests from commercial and noncommercial stations.

⁴ NCE licensees must also agree to make their public files available to local residents. This will become mostly obsolete soon as radio stations migrate their public files online allowing for universal access.

same consideration provided they also agree to maintain contact with their local community in the manner of NCE waiver recipients. Moreover, Blount does not believe that any type of evidence or proof of hardship should be required to be submitted by these licensees. NCE stations seeking waivers are not required to provide this information and the Commission should leave the question whether or not a broadcaster is in a sufficient hardship situation to merit consolidation to the discretion of the broadcaster.

Blount further believes that there should be no limit on the number of stations that are allowed to be co-located in one studio. No such restriction exists for NCE stations seeking waivers. As long as the AM licensee can legitimately maintain contact with the local community to ascertain its needs and programming trends, the actual location of the AM main studio should not be a major issue. For the same reason, there should be no restriction on the distance a co-locating station may move its studio from its community of license. The Commission routinely grants waivers for NCE stations to allow stations to relocate main studios over 1,000 miles away from the community of license. Moreover, as the Commission pointed out, these stations will all be placing their public files online within the next two years, allowing for easy and quick access of their records by their local listeners making distance almost irrelevant.

Blount also continues to support the relaxation of the staffing requirement for stand-alone AM stations. Currently, licensees are required to maintain a meaningful staff presence consisting at a minimum of full-time manager and full-time staff person. The driving force behind the staffing requirement was physical availability to the local community. Availability of licensees to the communities they serve is still a valid goal but physical availability requiring a full meaningful staff presence should not be required in this day and age of virtual availability and access. This is bolstered by the Commission's move to migrate station public files online.

Members of the local community can access the station's records and files from their homes at any time of the day or night without having to visit the station at all.

Technological improvements in monitoring and control of stations also means that full-time staff on-site is not critical. Stand alone AM stations should be given the option to reduce the staff presence at their stations and should be given the sole discretion to determine the amount of staffing necessary, provided they continue to provide a means for local community members to contact them. It is likely unnecessary to further require these stations to post the local mobile phone numbers of management and staff in light of the upcoming requirement to post contact information on the station's online public file profile. Similarly, the relaxation of the main studio rules and staffing requirements should not be linked or contingent upon the station participating in the online public file. Many of these stations may begin using the online public file as soon as it becomes available or quickly thereafter, but they need the relief from the financial obligation immediately.

The Commission also has requested comment on the cost savings that may result from these modifications. For Blount, the cost savings of even one main studio waiver would be in the neighborhood of \$90,000 annually. With declining revenues, savings of almost \$100,000 a year is significant. It could mean the difference between being able to keep a station on the air and serving the public and the station going dark because it is too much of a financial drain. It is impossible to overstate the necessity of these reforms for Blount and for all other similarly situated AM licensees.

II. Blount supports the revision of 74.1201 to allow for greater coverage.

Blount fully supports the proposal to amend 47 CFR 74.1201(g) to change the allowed coverage contour of an FM translator associated with an AM station to the greater of either the 2

mV/m daytime contour of the AM station or a 25 mile radius. It also supports the 40 mile cap on 1 mV/m coverage contour.

III. Conclusion

Blount respectfully requests that the Commission adopt its proposal to allow for waivers of the main studio rule for commercial AM stations and to ease the main studio presence requirement. Blount also reiterates its support for the revision of Section 74.1201(g).

Respectfully submitted,

Blount Masscom, et al



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