

March 13, 2016

Federal Communications Commission  
Office Of The Secretary  
Washington, DC 20554

FCC Order on Revitalization Of The AM Radio Service  
Released October 23, 2015

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;

Comments are against

Comments:

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

- 1 Licensee in good faith invested in construction of Expanded Band station KCNZ-AM-1650 in 1998 which greatly improved AM service to City of license, Cedar Falls, Iowa.
- 2 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 programming failures, the program experimentation 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 that 1st time AM radio service for a community, was better than NO radio service at all for that community.
- 3 That AM revitalization for improved program service on the standard band was further improved by adding a greatly improved technical improvement, by adding an FM translator to simulcast and rebroadcast the AM standard band station.
- 4 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.

With the commissions new current intent of the Revitalization the AM Radio Service, Standard Band Station KCFI AM 1250 proposes to join the commission in the revitalization effort. We hereby propose the following:

- 1 We are in favor of licensee retention of dual authorizations, in order to retain established 1<sup>st</sup> 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.

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 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.
- 4 The rules when the expanded band was approved prevented a single owner from owning more than 1 AM station in a single market. Since then, the ownership rules have changed and now a single owner can own multiple AM stations in a single market. Therefore, the new rules allow for stations to maintain both AM signals, making for a change in the original rules necessary. The old expanded rules were written when the ownership rules were different, and thus should be updated.

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