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Re: Protections afforded to Class A AM stations.

WPKZ Fitchburg is a Class B AM station with a 3 tower directional array at night and 2 tower directional array during the day operating at 5K watts and 1K watts at night. We strongly support the reduced Class A stations protections and in particular the night time protections that result in reduced broadcast signal and the more expensive enhanced 3-tower directional array. We would strongly support a rule that would allow us to maintain the same signal coverage and community service levels day and night. This approach would allow us to reduce one tower and use the savings to improve the broadcast activities of both day and night broadcasts. We also recommend that facility changes associated with moving night time coverage levels to the daytime pattern coverage to be treated in the approach proposed for MCDL technology implementation, by way of notifying the Commission using the CDBS.