



3-17-16

FCC
Washington, DC

I am president of W & B Broadcasting Inc., licensee of WAKY 620 AM, Louisville. I am writing this letter in support of the FCC's proposed rulemaking to revitalize the AM band.

WAKY 620 is licensed at 500 watts full-time with a 3 tower day/5 tower night directional antenna system. In addition to all the challenges of being a highly directional AM station, our null is to the east and southeast part of our city of license. Louisville's growth area has been and continues to be in the area of our null. Even though WAKY 620 is licensed to Louisville, it does not have a listenable signal in this growth area and cannot serve this large population area of Louisville. Under current rules, we are unable to locate a translator in the null area which is outside our 2 mV/m contour. I highly support the proposal that translators be allowed to be located within the 25-mile radius of the AM transmitter site. I also support the proposed relaxation of the daytime contours for B's, C's and D's and the change to 50% RSS for night protection.

The days of Class A stations having substantial listenership at night due to the sky wave skip are gone. Recently while driving from Nashville to Louisville during the nighttime, I was unable to receive a listenable signal on any Class A station, including WSM 650 and WHAS 840. I doubt that any audience numbers exist to support their assertion that people are listening to their nighttime signal. It is more a matter of protecting the big Class A large corporate owners at the expense of the smaller AM operators.

It is also time to end the discrimination of AM stations as it relates to moving to a more desirable frequency in their market. FM's are allowed to move to any frequency that will work. AM stations can only move three frequencies up or down from their current frequency. Where is the wisdom and reasoning in this rule?

Sincerely,


Bill Walters