

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
Revitalization of the AM Radio Service)	MB Docket No. 13-249
)	
Further Notice of Proposed Rulemaking and)	
Notice of Inquiry)	

**COMMENTS OF
STAR OVER ORLANDO, INC.**

I am writing in the matter of daytime and nighttime protection rules and supporting the Federal Communications Commission (FCC) proposed rule changes to eliminate the current protection standards both day and night for Class A Channels on the AM Band.

The viability of the AM Band depends on the expansion of power for these facility throughout the country. Their existence depends on the ability to perform in the marketplace and for the expansion of their signals to operate both day and night and where they should be heard.

The owners of the high powered Class A stations in major markets are the same ones that control as many as 7 signals in their respective markets along with a number of licensed translators.

The main objective for them is to control everything and not allow for smaller stations to serve communities both day and night with an adequate signal.

Local AM radio stations are unable to adequately cover their markets because of the limitations imposed by the FCC rule on interference protection for Class A channels. Some go off the air completely at night. This problem is found in small as well as large markets.

The undertaking of the F.C.C. to revitalize the AM band is most remarkable.

Day and Night Coverage in small and medium markets is extremely important to listeners and advertisers who live in the community, unlike the fringe signals of Class A channels going into those same areas.

The Class A signal now produces mostly static outside their main coverage area. The elimination of the current protection rules will not affect any coverage to the markets these Class A Channels are licensed to serve.

Recent editorials have spoken about the coverage loss in terms of listenership and advertising dollars but those same heads of broadcast companies never address the loss of service to small markets not to mention the loss of revenue by local broadcasters who cover local news, sports, weather and other valuable content.

When a local station is off the air because of FCC requirements and during a hurricane, tornado or other disaster, you can't depend on the Class A Channels to deliver that information when they may be several hundred miles away and unaware of weather conditions in that community.

Most of the content on the major group owned Class A (AM) Radio Stations are either voice tracked, automated or syndicated offerings with no real content specific to small markets. Gone are the days of programming providing Farm Reports, Traffic, Local News, Sports and other important information such as weather bulletins or emergency services.

These large corporations that control most of the Class A (AM) Channels provide no resources to handle any local content beyond their city of license coverage area.

Three of the largest Corporations have stock prices of under \$ 1.00 and some are fighting off bankruptcy and loan defaults. What you have with most major broadcasters is a series of layoff, firings, downsizing all affecting program content and service.

Think of it, about 75 licensed Class A Channels on the AM band vs. hundreds perhaps thousands of small broadcasters who will get immediate relief from rule changes affecting interference.

It will be an absolute turnaround for them since the costs of any upgrades are more than likely minimal.

Give the local broadcaster a chance to do better. We've seen what the major groups have done to the industry with their broadcast facilities and it's not pretty.

Local Radio is the backbone of the broadcast industry and the FCC should make every effort to see the local marketplace flourish with the expansion of radio service.

Eliminating the day and night interference protection rule will give the local broadcaster a much needed influence to attract more listeners and advertisers as well as service to the local licensed community both day and night.

Adding night service for local broadcast owners would also increase the employment numbers in radio and beyond. It will be an economic stimulus.

While major groups are all downsizing, eliminating the day and night interference may give local broadcasters the opportunity to expand, to be on the air serving their licensed community by adding a variety of jobs both on and off the air.

Many expert engineers have voiced their approval of reducing and or eliminating the interference levels especially at night and have given solid voice to the reasons behind it.

With the influence of technology, tower systems in communities, computers and more, the Class A (AM) Radio Stations are holding on to the past and not looking at the future.

Revitalizing AM Radio is a formidable undertaking of the FCC and what better way to action but to allow more AM Radio coverage both day and night.

Allow stations who can increase their power to do so when the interference protection rules are eliminated.

It could help broadcasters to eliminate one or two towers or seek land space for a tower site at a much reduced price, affording them the opportunity to save operating costs.

I am not alone in my thinking.

The FCC needs to act now on the elimination of the day and night time protection limits, then and only then will the FCC Revitalize the AM Band.

You can't revitalize the AM Band by way of FM Translators. That does not address the true nature of the problem. FM translator coverage of 6 to 8 miles can't begin to cover a market adequately, if a useable channel is even found in a particular market. Even then, most translators are directional, meaning adequate coverage is not possible. In some areas it takes several translators to do the job.

Translators are also compromised when a high powered FM Radio Station some 80 miles away can take the translator off the air by claiming listener interference for their main FM signal.

FM translators will always face a battle for the dial when the power of a translator is less and the height of the antenna is not maximized.

You can revitalize the AM Band by allowing stations to improve their AM facility and mandate equipment manufacturers to improve the quality of AM Speakers in cars and in other audio systems and devices.

Respectfully Submitted,

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