

In the Matter of )  
 )  
Revitalization of the AM Radio Service ) MB Docket No. 13-249

## **COMMENTS BY KD RADIO INC.**

KD Radio Inc. is the licensee of Class C AM station KDSK at Los Ranchos de Albuquerque, New Mexico. KD Radio is also the permittee of new AM fill-in translator K225CH (formerly K297BG).

**1. Class C AM power limit.** When the Commission's proposal to reduce the daytime protection requirements among AM stations is implemented, Class B and D AM stations will have new power and channel options which will be very helpful in improving their daytime coverage. However, in the Commission's proposal, there is no provision for lifting the daytime power limit of 1,000 watts which is imposed on Class C stations. Therefore, I am writing to request the Commission consider raising the daytime power limit for Class C AM stations. The new Class C power limit could be approximately 4,000 watts when co-channel overlap would take place, which would keep the overlap ratio between co-channel Class C stations the same. For other situations, where stations are more distantly separated, the power limit could be raised to the same as Class B and D channels, 50 kw.

When the operation of the new FM fill-in translator is implemented, we expect to retain a large percentage of listenership to KDSK-AM, so having the ability to improve our daytime signal would be of great value.

**2. Changing the 99-watt I.F. protection rule.** The new KD Radio Inc. AM fill-in translator is limited to 99 watts so as not to enter the 100-watt threshold where the I.F. separation rules take effect. In the case of our new K225CH translator, it is limited to 99 watts due to existing 250-watt translator K279BP which is located at the same site. I hereby request the Commission change the I.F. protection threshold to allow a power level of 250 watts before the I.F. separation rules take effect. When such a rule change is implemented, KD Radio's K225CH may apply for

an operating power of 220 watts ERP while fully protecting all other existing and pending full-power, translator and LPFM stations.

Sincerely,

KD Radio, Inc.

A handwritten signature in black ink, appearing to read "Derek Underhill". The signature is written in a cursive style with a large initial "D" and "U".

Derek Underhill  
President and owner, KD Radio Inc.

733 East Roosevelt  
Grants, NM 87020  
505-2856-5598