

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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

FIRST REPORT AND ORDER, FURTHER NOTICE OF PROPOSED RULE MAKING, and NOTICE OF INQUIRY

SUPPLEMENTAL COMMENTS OF CTC Media Group, Inc. New Bern, NC

As the owners and operators of 3 AM radio stations in Eastern North Carolina, we wish to express our appreciation to the Commission's staff on the renewed focus and carefully deliberation that has been directed to the task of revitalizing the AM radio service. Our organization and the many hundreds of other fellow AM broadcasters perform a vital service to the communities we serve, providing a reassuring outlet for local expression. In times of emergency, we represent a reliable source of up-to-date local information to our listeners.

The Commission's proposal to revise protection requirements for daytime service contours to establish the 2.0 mV/m primary service contour will provide a substantial signal level margin over the ever increasing noise floor¹. This will enhance the quality of the service that will be provided to our listeners.

Unfortunately, while the proposal sets the stage for AM Class B and Class D stations to increase power (establishing more realistic prohibited overlap requirements), it does not afford any respite to the licensees who operate on the six class C channels (1230, 1240, 1340, 1400, 1450 and 1490 kHz) since the proposed rules restrict the daytime power to a maximum of 1kW.² According to FCC data, an estimated 988³ licensed stations of the approximately 5,000 AM radio stations are these Class C licensees.

We note that as a part of the changes in AM allocation made in 1991⁴, the Commission removed a 5 kW prior power restriction on the previously defined Class III regional channels and permitted, subject to provisions of § 73.37, a maximum power of 50 kW to be consistent with Class I & Class

¹ Revitalization of the AM Radio Service MB Docket No. 13-249 ¶ 64

² Proposed rule change to §73.182 (a) (3) retains the limitation of 1kW for both day and nighttime operation.

³ Our internal review of the current FCC on line database

⁴ 56 FR 64857

II⁵ channels. At that time, local channels were redefined from Class IV to current Class C designation. The 1991 rule revisions offered no opportunity for Class C stations to enhance technical faculties beyond 1 kW.

Based on our examination of the First R&O adopted 10/21/15, we can see no completing reason why Class C stations should not be afforded similar upgrade opportunities to Class B and D AM facilities (consistent with proposed § 73.37) to increase daytime power increase 6 dB over the current authorized power⁶. In the absence of authority to enhancement signal level, Class C stations would fall even farther into the abyss of the interference and competitive relevancy in their market. In order for Class C stations to even stay on parity with Class B and D facilities during daytime hours, Class C stations will also need to have their technical tool box options expanded, as all other AM licensees.

With regard to nighttime operation, it is our view that an increase in power would have marginal impact for Class C stations. We note that this round of rulemaking is focused on daytime operation and that the high ambient noise levels are associated with both day and night operation. Most of the Class C licensees within the confines of the continental US are limited in coverage due to co-channel interference. Typical due to the large number of stations an each of the channels, reliable coverage is limited to between the 20 and 30 mV/m contour. With such high levels of existing interference at the 1 kW level, the increase in coverage a Class station by 6 dB nighttime would be imperceptible to listens. The only measureable outcome would be the increase in the utility cost to power transmitter nighttime.

In summary, we request consideration given to permitting Class C stations, subject to requirement of § 73.37 at a power level of 6 dB over the current daytime licensed power level, not to exceed 4 kW and with no change nighttime.

Respectfully submitted,

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⁵ Prior to 1991 Class II stations operated on Class I channels, fully protecting Class

⁶ Under the current rules, Class C stations are now normally protected to the 1 mV/m at 1 kW power level, the 2 mV/m contour represents a 6 dB increase in signal level to maintain coverage parity