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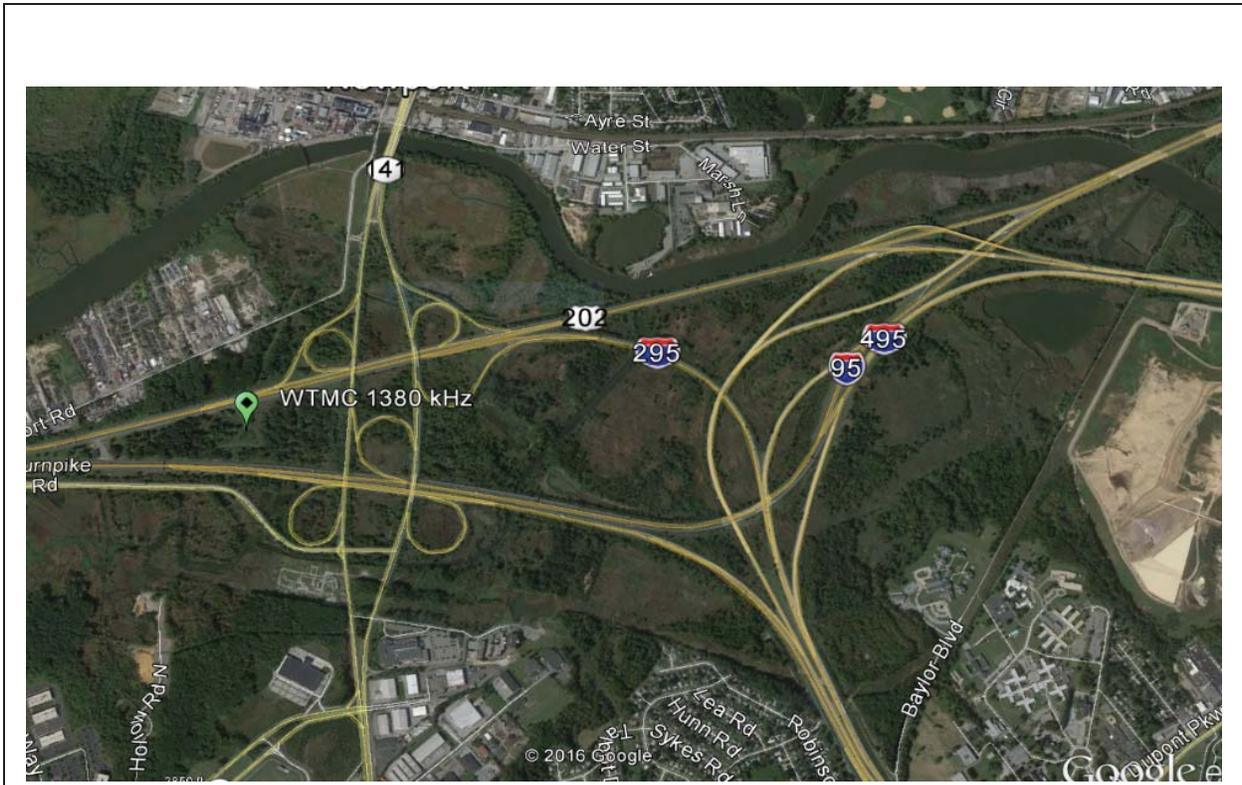
Before the
 FEDERAL COMMUNICATIONS COMMISSION
 Washington, D.C. 20554

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

COMMENTS OF Delaware Department of Transportation (DelDOT)

As the licensee of commercial AM radio WTMC in Wilmington, Delaware, we wish to express our support of the Commission’s Proposed Rule Changes proposed in Docket 13-249 – Appendix B. WTMC is a licensed Class D station operating with a power of 250 Watts daytime and 10 Watts night. The station provides up-to-date traffic information (on a 24 hour-a-day / 7 days a week basis) to the traveling public along on of the nation’s most traveled Interstate Highway segments. The Google map below illustrates the location of the WTMC transmitter site with respect to Interstate Routes I-95, 295 & 495.



Traffic counts in this Interstate Highway corridor regularly exceeds over 100,000 vehicles (per discrete counter) on many specific route segments on a *daily* basis. Some road sections have even heavier traffic on weekends, especially during special events and summer seasonal visitors to the beach areas nearby. By itself, regular interstate traffic travelling up and down the congested I-95 corridor (tens of thousands of vehicles daily) represents a large group of potential radio listeners to WTMC as commuters attempt to navigate the best route of travel according to changing road and traffic conditions. A regular weekday will see more than an average of 290,000 vehicles travel through this radio service area (average daily weekend counts show around 220,000 vehicles) and increasing the reliability and coverage of the AM radio service, especially during critical hours and nighttime, will give better and more recent commuting, traffic and emergency information for those travelers.

The Commission's proposal to revise the § 73.37 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 radio service that will be provided to our listeners. It will permit us the increase daytime power so that our signal level will be greater than the high level of RF noise along the Interstate corridor which already emanates from a number of nearby sources: electrified railroads, backbone electrical grid high-voltage power transmission lines and other major industrial facilities.

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

WTMC is licensed as an omni-directional antenna pattern both day and night. Currently the nighttime power is limited to only 10 Watts. There are opportunities to raise power from that limit based on our pre-sunrise and post sunset authorization. We also support the Commission's proposal to change the Nighttime RDD Calculations Methodology² to return the RSS calculations to the pre-1991 levels. This would permit DelDOT to enhance our nighttime and post sunset coverage to extend radio coverage in this heavily travelled traffic corridor.

In closing, assuming that the proposed new rules are adopted by the Commission, DelDOT proposes to move quickly to enhance WTMC coverage both day and night. We also encourage the Commission, as a part of the AM Revitalization efforts, to study further options for redefining AM nighttime coverage so Class D facilities such as WTMC will have a more relevant, local signal presence on a 24 hour basis, 7 days a week.

Delaware Department of Transportation
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Respectfully submitted,

Gene Donaldson

² ¶ 58 - 62