

March 18, 2016

The Honorable Thomas Wheeler
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: In the Matter of Revitalization of the AM Radio Service
MB Docket No. 13-249, Further Notice of Proposed Rulemaking

Dear Mr. Chairman,

I write to express the University of Northern Iowa's concern about the Commission's proposal to reduce substantially the interference protections to Class A AM radio stations contained in its Further Notice of Proposed Rulemaking to revitalize the AM radio service. The Commission's proposal, if adopted, could deprive loyal UNI Panther fans, i.e., U.S. consumers, of their ability to listen to radio broadcasts of men's and women's athletics on KXEL-AM. These broadcasts would be subject to so much interference under the proposed rules that listening across significant portions of our fan base could be so impeded by interference that fans would probably tune out.

In addition to being committed to fielding the best teams that we possibly can, one of our priorities is to ensure that our fans have easy and dependable access to the games we play. Over many decades, there has been no more sure way to provide that enjoyment to many of our fans than through free, over-the-air radio that reaches throughout the listening area of large Class A AM stations. Our fan base is not limited to the vicinity of our home field or to the proximate location of the radio station that broadcasts our games; our fans stretch literally across hundreds of miles.

Radio station KXEL has been broadcasting our games for nearly 25 years. Fans from all across our state and region are accustomed to tuning in to our games on that station. The Commission's proposal to reduce interference protections to Class A AM radio stations that broadcast not only our games but the overwhelming majority of games around the country cut directly in the opposite direction, disrupting consumers' listening experience by drowning them in interference.

Finally, the proposed changes to the interference rules, if adopted, may be contrary to certain basic assumptions governing relationships and contractual arrangements across the country, between radio stations and institutions/organizations such as the University of Northern Iowa. In entering into a broadcasting rights agreement, the coverage area of the broadcasting station may often be considered. The proposed interference rules may change broadcasting station coverage area, causing uncertainty in stable relationships and the possible need or desire for renegotiation of existing contracts. For all of the above reasons, we urge the Commission not to adopt these interference rules changes proposed in its Further Notice of Proposed Rulemaking.

Sincerely,



William Ruud, Ph.D.
President