

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
)
REVITALIZATION OF THE AM RADIO SERVICE) MB Docket No. 13-249

To: The Commission

Comments

Larry H. Will, PE, a Licensed Professional Engineer in Pennsylvania and New Jersey (“LHW”), hereby submits these Comments in the above-captioned proceeding to revitalize AM radio service. In support thereof, LHW submits the following:

LHW has over 50 years experience in radio and television broadcasting including radio station partner ownership and holding various Chief Engineer and Director of Engineering experience positions; as well as civilian and military strategic and tactical point to point and satellite communications systems.

As a result of his experience, LHW is directly interested in the proposals the Commission has set forth in the *Revitalization of the AM Radio Service*, First Report and Order, Further Notice of Proposed Rule Making, and Notice of Inquiry, FCC 15-142, released October 23, 2015 (the “FNPRM”). It welcomes the Commission’s consideration of ways in which to improve AM service to the public. LHW is limiting its comments to Section V-A, UTILIZATION OF AM EXPANDED BAND with the Notice of Inquiry (“NOI”) portion of this proceeding.

Specifically, LHW, in response to the Commission's Discussion in Para 82, with regards to starting a dialog regarding "*who should be allowed to receive authorizations in the Expanded Band*", and based on the numbers of existing Class C stations and possibly others¹ who still are unable to operate at *any power level* at night because of long established Class A stations requiring protection to the 0.5 mV/m 50% nighttime skywave contour. LHW believes that first priority to migrate to the Expanded Band should be awarded to such stations that are located within the prohibited Class A nighttime contour and would be able, with appropriate frequency and antenna system changes, be able to move to an Expanded Band frequency at reasonable cost².

LHW also suggests that existing stations with high "nighttime limits" and stations located in areas with few other fulltime AM stations be afforded high priority in transitioning to the Expanded Band.

Basically this would first establish a method of an overall improvement in service without an increase in total station count – given that any station that transitions to the Expanded Band would surrender their authority to operate with their previous parameters in a very timely manner³.

Consistent with the NOI at Para 84, and along with the above suggestion, LHW also believes that the simple 10 kW Day-1 kW- Night allotment procedure may not be the most

¹ These stations should be named and given the highest priority and not be constrained by the competing application process. The undersigned is aware of several stations that have been broadcasting daytime only and located within a co-channel Class A nighttime 0.5 mV/m 50% skywave contour.

² Assuming that the Commission adopts Rules that change the Class A nighttime protection to 0.4 mV/m, 50% Groundwave, the ability for some stations to remain on the Class A channel could or could result in that remaining Class C station having to operate with an inordinately high Night Limit, thus severely limiting nighttime coverage. With proper engineering, that issue would not occur with a channel change and in some cases result in a net improvement in reducing nighttime inter-station interference.

³ The Expanded Band is been operational for years. Receiver availability is no longer an issue allowing frequency change "flash cuts" to be realistic.

efficient operation in the Expanded Band. Since, ground wave propagation coverage continues to drop in “efficiency” with an increase in operating frequency, more power is certainly needed in Daytime and Nighttime in the Expanded Band over that even in the upper existing band to provide equivalent day and night coverage⁴.

LHW believes, consistent with International Agreements⁵, that the Commission consider several options for both day and nighttime power levels⁶. However, due to the very high costs for designing, constructing, and maintaining complex directional antenna systems, that the Expanded Band should continue to not permit directional antennas⁷.

LHW looks forward to the Commission’s further steps in this process of improving the utilization of the Expanded Band and designing a system of allocation or construction by contour protection *with a goal of improving localism* especially for stations presently handicapped by no ability to operate at all at night or presently operating with very high “nighttime limits” which severely curtail the available useful listening area⁸.

Respectfully submitted,



Larry H. Will, PE

March 21, 2016

⁴ Groundwave propagation charts that are already a part of the Commission’s Rules show the increasing deviation from “Free Space” numbers with increasing frequency while analysis of actual data supplied with many station applications, high power levels should continue to be permitted.

⁵ NOI at 84.

⁶ Nighttime power levels of 0.5 to 2.5 kilowatts non-directional should be considered.

⁷ A possible exception could be made for coastal stations wishing to limit power over large areas of open water.

⁸ These two criteria could be utilized in a planned allotment system.