Before the
Federal Communications Commission
Washington, DC

In the Matter of:

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

COMMENTS OF WOLF RADIO, INC.

WOLF Radio, Inc. ("WRI") is the licensee of two Class C AM radio stations: WOLF, 1490 kHz, Syracuse, NY and WMBO, 1340 kHz, Auburn, NY. WOLF commenced operation in 1940 and WMBO in 1927. Both have had long service records in the Syracuse and Central New York area.

While there are many areas worthy of comment in the Commission's NPRM, one area of particular interest to WRI is that adoption of the proposal as presented in the NPRM would not only have devastating consequences to WRI's stations, but to all Class C AM stations nationwide.

Simply put, the stations' service areas would drastically be reduced. WRI's stations presently enjoy service to most of their respective 0.5 mv/m service contours. The NPRM would reduce the protected area to 2 mv/m. While Class B and D stations would be able to increase power to offset the reduced distance of their protected contours, Class C stations are presently limited to 1,000 watts with no increase in power. Unless Class C stations can increase power in a likewise manner, their protected coverage areas would be severely reduced.

The attached Figures 1 and 2 depict the severe reduction in coverage that would occur to WRI's stations as a result of implementation of the NPRM as proposed.

It is noted that for Class B and D stations, it would require 16 times their present power in order to have the same coverage with the newly protected 2.0 mv/m contours as compared with their present 0.5 mv/m contours. By way of explanation, it takes four times the power to double the field strength at any given location, so in order to replicate a 0.5 mv/m contour with a new 2 mv/m contour which is a field factor of four times, the power would have to increase by a factor of 16. Thus, a 5 kW station would require 80 kW to preserve its presently protected service area.

In the case of WRI's stations or any Class C stations, it would require 16 kW to preserve the present service area. In the case of all Class C stations, the potentially interfering offenders would be first adjacent Class B and D stations proposing significant power increases without the ability of the Class C stations to apply for and implement similar increases in power.

It is for this reason that the NPRM is flawed in its concept for any attempt at "Revitalization" of the hundreds of existing Class C stations nationwide. WRI is not unique in that its stations have multiple first adjacent Class B and D stations that would literally destroy the coverage that WOLF and WMBO now enjoy.

The changes proposed in the NPRM are too radical. As has been shown, without a corresponding power increase, Class C stations would suffer irreparable damage. In all likelihood, most Class B and D stations would find that 16 times power increases would be impractical both from the standpoint of equipment costs and corresponding electrical

operating expenses, not to mention probable changes in or the addition of directional antenna systems.

In summary, WRI recommends that the change in contour protection be no greater than the 1.0 mv/m contour (rather than 2.0 mv/m) thereby requiring only a four times power increase to maintain any given station's existing service area. Further, with regard to Class C stations, any such change should allow all Class C stations to increase to a power of no less than 4 kW fulltime. If this is to be a "Revitalization" for AM, than all stations should be permitted to improve service and Class C stations should not be excluded from participating in this one-time opportunity for enhancement of service which will affect the long-term ability and success for AM stations to continue to serving their licensed communities and the public at large.

Respectfully submitted,

WOLF RADIO, INC.

By: Craig Fox
Craig Fox, President

Dated: March 21, 2016

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Figure 1 - WOLF, Syracuse, NY and WMBO, Auburn, NY - .5 mv/m Daytime Contours

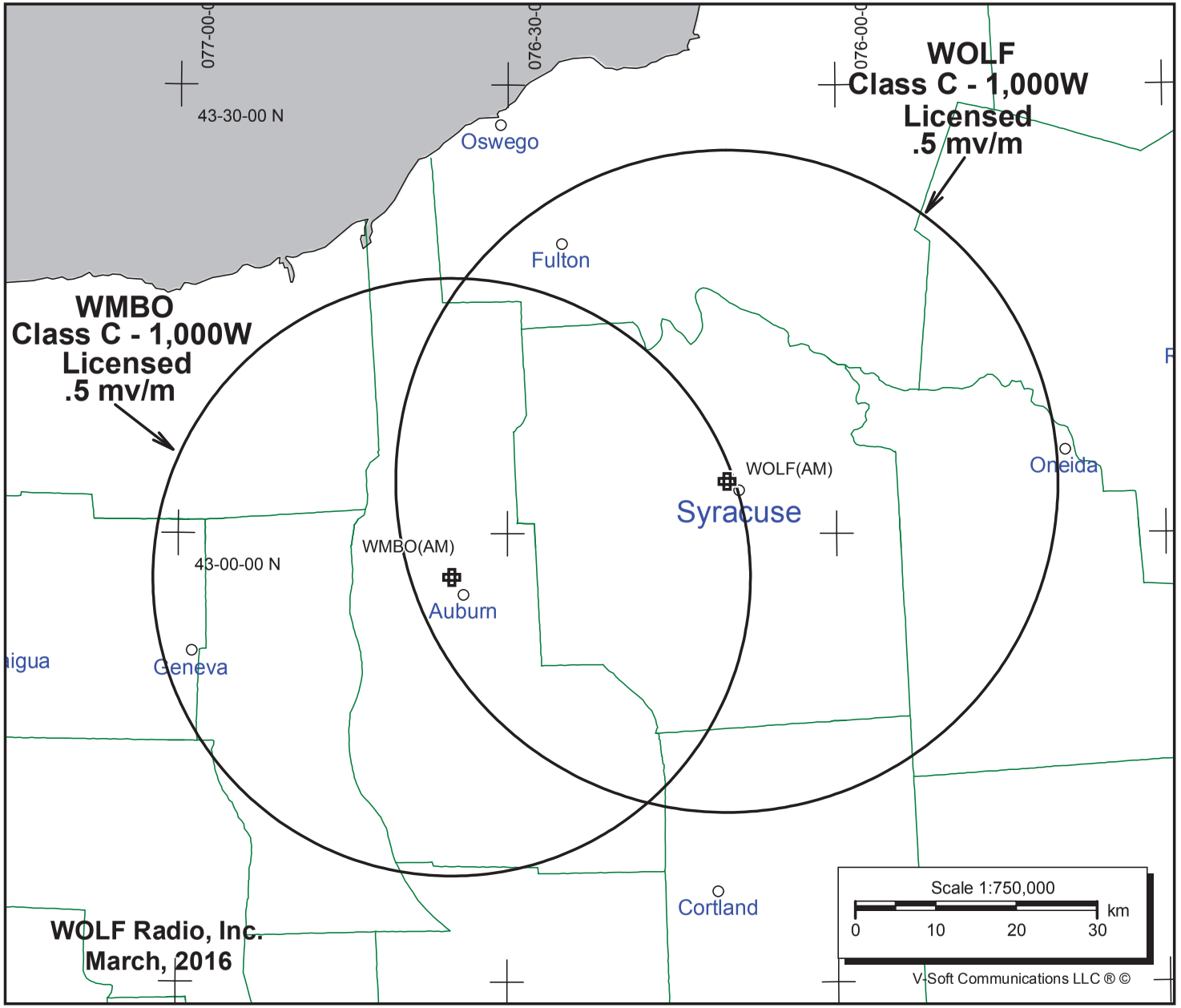

Figure 2 - WOLF, Syracuse, NY and WMBO, Auburn, NY - 2.0 mv/m NPRM Daytime Contours