

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

In the Matter of)
Revitalization of the AM Radio Service)
First Report And Order, Further Notice of) MB Docket No. 13-249
Proposed Rule Making and Notice of Inquiry)

To: The Commission

REPLY COMMENTS OF RADIO VISION CRISTIANA MANAGEMENT

Radio Vision Cristiana Management (“Radio Vision”), by its counsel, pursuant to Section 1.415 of the Commission’s Rules, hereby submits these Reply Comments in the above-captioned AM Revitalization Rule Making Proceeding, wherein the FCC seeks to investigate possible changes to its rules which would allow AM broadcasters to better serve the public.

In its March 21, 2016 Comments in this proceeding, Radio Vision urged the Commission to modify the AM protection standards; change the nighttime RSS calculation methodology; change the daytime protection to Class B, C, and D stations; revise the rule on siting of FM cross-service fill-in translator stations; modify the Commission’s partial proof of performance rules; and modify the rules for Method of Moments proofs. Radio Vision still fully supports all of those rule changes. However, in these Reply Comments, it especially focuses on only one issue: the need to change the nighttime RSS calculation methodology.

At paragraph 62 of the First Report and Order in this proceeding, FCC 15-142, released October 23, 2015, the Commission proposed modified nighttime protection standards which, Radio Vision reasserts, are much more in keeping with the nighttime allocation rules employed by our neighbors in Canada and Mexico:

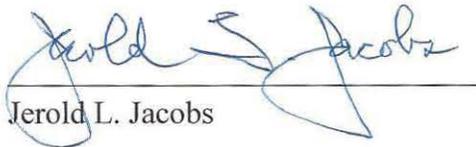
“We therefore tentatively conclude that we should roll back the 1991 rule changes as they pertain to calculation of nighttime RSS values of interfering field strengths and nighttime interference free service. We propose to amend Section 78.182(k) of the Rules to return to predicting the nighttime interference-free coverage area using only the interference contributions from co-channel stations and the 50 percent exclusion method.”

Radio Vision wholeheartedly supports the removal of adjacent channel protection requirements in the calculation of nighttime interference and protection of station nighttime service based on the 50% RSS. The Commission itself offers a most powerful reason for making this change when it states “... the rules have impeded facility improvements that are more necessary now than 24 years ago, because the noise floor has increased as much as or more than station-to-station interference, and increasing signal strength to a station’s primary service area has become more of a priority than maintenance of rules that offer a small return on interference reduction, compared to the burden they impose on signal improvement.” The Commission is to be commended for reviewing its AM protection policies and for concluding that this change in the nighttime RSS calculation methodology is appropriate and overdue.

Respectfully submitted,

RADIO VISION CRISTIANA MANAGEMENT

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