

Cohen, Dippell and Everist, P.C.

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

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

Reply Comments
on Behalf of
COHEN, DIPPELL AND EVERIST, P.C.

The following reply comments are submitted on behalf of Cohen, Dippell and Everist, P.C. ("CDE") and is in response to the First Report and Order, Further Notice of Proposed Rulemaking, and Notice of Inquiry ("FNPR/NOI") dated October 23, 2015 and Public Notice dated January 19, 2016. CDE and its predecessors have practiced before the Federal Communications Commission ("FCC") for over 75 years in broadcast and telecommunications matters. The firm or its predecessors have been located in Washington, DC since 1937 and performed professional consulting engineering services to the communication industry.

The undersigned is licensed as a Professional Engineer in the District of Columbia and has been in continuous employment with this firm or its predecessors for over fifty (50) years.

We have examined the comments of Hatfield and Dawson Consulting Engineering, LLC; du Treil, Lundin & Rackley, Inc.; National Association of Broadcasters; Carl T. Jones

Corporation; R. Morgan Burrow Jr.; Joint Commenters¹ KAHN Corporation and Society of Broadcast Engineers, Inc., State of Delaware Department of Transportation (DelDOT) and AM Radio Preservation Alliance.

There are many technical comments filed that have merit. The Society of Broadcast Engineers ("SBE") has addressed the issue that the high noise levels is a major impediment in the AM band in concise language. In fact, it is the silent problem throughout the RF spectrum. The FCC and in particular, the Broadcast Bureau is urged to address this very important topic.

The AM Radio Preservation Alliance's comments have tried to address the issues raised by the FNPRM/NOI. While this firm makes no reference to AM Radio Preservation Alliance comments, several items are unclear

- Exhibit F, "WSB existing 50% RSS - 3.6 mV/m"
"KMOX existing 50% RSS - 1.8 mV/m"
- In Exhibit P, the basis of the predicted interference area is not provided.
- In Exhibit Q, the shaded area which purports to reflect the interference area should be labeled overlap area.

¹Bay Bridge Communications, LLC, Chesapeake - Portsmouth Broadcasting Corporation, Chisholm Trail Broadcasting Co.; Inspiration Media, Inc., KRIZ Broadcasting, Inc.; Multicultural Radio Broadcasting Licensee, LLC; NRG License Sub, LLC; Salem Media of Colorado, Inc.; Way Broadcasting Licensee, LLC and Multicultural Media, Telecom and Internet Council

The basis of each of these exhibits is not found nor obvious.

The relevance of the FCC's question are all the Class A stations² operating in the public interest is reasonable.

In summary, this firm believes notwithstanding several of the technical exhibits in The AM Radio Preservation Alliance's comments that Class A stations³ still offer the best method for wide service in the event of a national emergency.

There are several serious threats on the horizon, both involves the nation's power grid. If the power grid is compromised, the nation will be hard pressed to maintain its equilibrium. Dr. Peter Vincent Pry has published several books regarding the vulnerability of nation's power grid. The most recent is *Blackout Wars*⁴, with an earlier book entitled, *Electric Armageddon*.⁵

Certainly this public interest of timely communications to the general public⁶ is in the

²An item has been abstracted from *Radio World*, dated April 13, 2016, page 38 under the *Reader's Forum* entitled, "Tough Love for Radio". The article in part asserts, "In Cincinnati, 927,000 households lost power. Approximately 2.1 million people were without power." While the area was subject to Hurricane Ike, the Class A station ran a Bengals game. If true, this firm believes that is not in the public interest.

³It is presumed that there is no change in Section 90.242 of the FCC Rules with reference to Travelers' Information Stations

⁴Unknown Publisher

⁵Unknown publisher

⁶In PS Docket No. 15-94, EB Docket No. 04-296, this firm filed comments dated September 11, 2015 which offered the current status of emergency wireless notifications "While the system delivery is being refined we note that at the last weather emergency in the District of Columbia this office employee's three cell phones communicated the weather alert about 5 minutes after the weather event had passed this firm's offices at 1420 N Street, NW Washington, DC

national interest in times of a dire situation affecting a particular area of the United States or the entire nation as a whole.

Change Nighttime RSS Calculation Methodology

Based on the comments from the firms of AFCCE full members, this firm continues to support the return to the RSS calculation methodology used prior to the adoption of the current "Ratchet Rule."

Change Daytime Protection Ratio to Class B, C and D Stations

Based on the comments from the firms of AFCCE full members, this firm continues to support the return to the first-adjacent ratio of 0 dB used prior to the adoption of the current 6 dB D/U daytime protection ratio.

Change Daytime Protected Contours to Class B, C, and D Stations

Based on the comments supplied by Carl T. Jones Corporation, this firm is modifying its comments to support the change to the normally protected contour from 0.5 mV/m to 1 mV/m.

Revised Rule on Siting of FM Cross-Service Fill-in Translators

This firm continues to support the additional flexibility by allowing the 1 mV/m contour of FM translators from a radius centered at the AM transmitter site be no greater than the AM station's 2 mV/m contour or a 25-mile (40 km) radius.

Modify Partial Proof of Performance Rules

This firm continues to support the proposed modification of Section 73.154 of the FCC Rules with one exception that one radial be established that defines the major lobe as established in the recent referenced full proof-of-performance.

Main Studio

This firm continues to support retention of the current FCC Rule Section 73.1125.

Require Surrender of Licenses by Dual Expanded Band/Standard Band Licenses

While primarily a legal question, this firm continues to support the requirement that the 25 remaining dual-band stations surrender one of the two authorizations. This firm offers no opinion on how the band 1600 KHz to 1705 KHz should be assigned.

This firm expresses its continued appreciation of the FCC's efforts to promote and assist in the revitalization of the AM radio service.

Respectfully Submitted,

COHEN, DIPPELL AND EVERIST, P.C.


Donald G. Everist
President

DATE: April 18, 2016