

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of:)

Revitalization of the AM Radio Service)

MB Docket No. 13-249

REPLY 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 WNDR (formerly WMBO), 1340 kHz, Auburn, NY. As previously stated in its Comments, both stations have long service records in the Syracuse and Central New York area.

In addition to WRI’s comments, the Commission’s NPRM has drawn a number of other commenters who echo the fact that Class C stations are being “left out” of the proposed revitalization initiative. Thus, the fact that Class C stations would suffer new interference and a reduction of service that can’t be offset by any allowable power increase would not comport in any manner with the initiative of “revitalization.” In fact Class C stations would experience a most definite “devitalization” due to the inability to employ power increases while all other classes of stations would be permitted to do so.

From a historical perspective, Class C stations began as 250 watt facilities. At a later time, they were permitted to increase to 1 kW without regard for prohibitive overlap to other co-channel Class C stations. As a result, in some directions, it is possible that Class C stations may receive interference within their .5 mv/m contour possibly as high as to their 1 mv/m contour. However, in most cases it is over a relatively small azimuth.

Further, once licensed at 1 kW, stations of other classes on adjacent frequencies must still protect Class C stations to their .5 mv/m contour.

The Commission's NPRM as proposed would permit encroachment up to the 2 mv/m contour of the affected Class C station without any ability for the Class C station to attempt to replicate its existing service by increasing its power. This is certain to have a destructive effect on most, if not all, Class C stations.

In its Comments, the NAB provided a table in Appendix A of fourteen "Root" stations that were selected for a study of power increases. In the table, Root Station #1 KBNP, 1410 kHz, Portland, OR could increase from 5 kW to 8.5 kW with a 4.2% increase in population served. Affected stations are listed as KEDO, KZZD and KYKN. Of the three, KZZD and KYKN would be able to increase from 5 to 50 kW while "affected" Class C station KEDO must remain at 1 kW. Although a specific percentage was not included in the table, the effect to KEDO would be a decrease in population served because, as a Class C station, it cannot increase its power while the other two affected stations KZZD and KYKN would enjoy population increases due their ability to increase their power by tenfold.

Example number two in the NAB table shows that Root Station KGAL would be able to increase from 5 to 50 kW as well as affected stations KOPB, KTIL and KOHI. That is to say all four stations in this group would be able to increase to 50 kW. For KOPB and KTIL, the power increase is tenfold. For station KOHI, its power would go from 1 kW to a whopping 50 kW! This clearly shows the great disparity that would occur whereby Class C stations would not be permitted any power increase whatsoever either to replicate service or protect themselves from new adjacent channel interference.

While WRI's AM stations are located in upstate New York and stations listed in the NAB's table are located in various communities throughout the U.S., one need look no further than Washington, DC where two Class C AM stations reside: WOL, 1450 kHz and WYCB, 1340 kHz. Both of these stations have long been well established in the nation's capital. WOL is Urban Talk and WYCB is Urban Gospel. Each of these stations is flanked by a number of first adjacent stations that would be able to propose power increases under the NPRM. However, both WOL and WYCB are just as deserving for being able to propose power increases to protect their service areas. These two stations are not unique in this regard and hundreds of Class C stations nationwide would be affected in the same manner.

In summary, the NPRM is flawed in its approach to revitalize AM stations. Either Class C stations must be given an opportunity to increase power to at least four kilowatts or ultimately if no power increase is permitted for Class C stations in the AM Revitalization plan, then first adjacent stations must continue to protect Class C stations to their presently protected contours.

Respectfully submitted,

WOLF Radio, Inc.

By: /s Craig Fox, President

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