

Before the  
Federal Communications Commission  
Washington, DC 20554  
In the Matter of:

Petition for Rule Making of American )  
Community AM Broadcasters Association to ) RM-9419  
allow AM licensees to become licensees of FM )  
translators for retransmission fill-in service )

To: FCC / Mass Media Bureau

Comments on RM-9419

Submitted by: Americans for Radio Diversity (ARD)

Americans for Radio Diversity (ARD) is a nonprofit organization, composed of concerned radio listeners and consumers, dedicated to promoting community orientated public and commercial broadcasting. In interest of this purpose, ARD files the following comments in regard to the petition for rule making filed by the American Community AM Broadcasters Association (ACAMBA).

One of the main arguments that ACAMBA uses is that instating FM translators for AM licensees would better serve local communities. Although this is a noble cause and perhaps is true, ARD believes that doing this is not the most effective way available to serve local communities.

ARD, as stated in our comments and petitions filed on LPFM (reference RM-9208 and RM-9242), believes that giving spectrum to broadcasters with existing licenses is not an effective way to provide for the diverse needs of a local community. Crowding the FM spectrum with AM license holders would only make it harder for potential community orientated LPFM broadcasters to find space to broadcast. ARD feels that by simply stating that AM stations should have FM translators just because FM stations do, as ACAMBA has in RM-9419, is not a sufficient explanation on how this is a proposal that will best serve the public. ARD further suggests that issuing translator licenses to FM broadcasters is also not always in the best interest of the public. Especially in light of the fact that there are so many potential broadcasters willing to originate programming rather than repeating it.

ARD feels that communities could benefit, under certain circumstances, from ACAMBA's proposed rule changes, but we ask the FCC and the Mass Media Bureau to consider if this is the best solution in an effort to provide a broadcast service that meets the diverse interests, tastes, and backgrounds, of local communities.

Respectfully Yours,  
Glenn Austin, for

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