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January 8, 1999

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: RM-9419

Dear Ms. Salas:

On behalf of Hancorn L.L.C., we are herewith filing an original and four (4) copies of its "Comments" with respect to RM-9419 regarding the licensing of FM translators to AM licensees.

Should any questions arise with respect to this matter, please contact the undersigned counsel.

Respectfully submitted,

KAYE, SCHOLER, FIERMAN, HAYS & HANDLER, LLP

By: 
Allan G. Moskowitz

Enclosure

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Federal Communications Commission

WASHINGTON, D.C. 20554

In the Matter of)	
)	
Amendment of Sections 74.1231,)	MM Docket No. _____
74.1232, 74.1233, 74.1284 of the)	
Commission's Rules)	RM-9419
)	

TO: Mass Media Bureau

COMMENTS

Hancom L.L.C. ("Hancom"), licensee of Radio Station WHYT(AM), Marine City, Michigan, by its attorney, hereby submits its conditional supporting "Comments" with respect to the above-referenced "Petition for Rulemaking" filed by American Community AM Broadcasters Association ("ACAMBA") to allow AM licensees to become licensees of FM translators and to use them to retransmit their signals as fill-in service.

Radio Station WHYT(AM) is licensed to operate with 1000 watts daytime but only 102 watts at night. During daytime hours, WHYT(AM) has city grade coverage of Port Huron, Michigan, which is the center of population of St. Clair County, and where the station's main studio is located. However, at night, with only 102 watts, the station's signal and, therefore, its audience, is greatly diminished. Consequently, due to the extremely poor nighttime signal, WHYT(AM) can barely provide emergency information regarding hazardous weather, road closings, and other public safety announcements, not to mention its own musical format to its listening area.

Hancom strongly agrees with ACAMBA that AM stations have been "hamstrung" in their ability to compete with full-time FM stations and therefore supports licensing FM

translators to AM licensees for nighttime operation. However, unlike ACAMBA, Hancom does not support limiting the use of FM translators to AM stations which have a licensed nighttime power not exceeding 500 watts in that daytime only AM stations and AM stations with less than 500 watts are just as deserving of nighttime authority as AM stations with greater nighttime wattage. Hancom, however, does agree that FM translators should only be authorized to fill out the AM station's existing 0.5 mV/m contour and not be allowed to extend that contour.

Consequently, Hancom strongly submits that it would be in the public interest for its service area to receive WHYT(AM)'s programming during nighttime hours. Consequently, Hancom urges the Commission to initiate a rulemaking to examine the question of allowing AM station licensees to become the licensees of, and to rebroadcast their signals on, FM translator stations within their service area.

Respectfully submitted,

HANCOM L.L.C.

By: 
Allan G. Moskowitz
Its Attorney

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January 8, 1999

CERTIFICATE OF SERVICE

I, Diane E. Bateman, of the law firm Kaye, Scholer, Fierman, Hays & Handler, LLP, do hereby certify that on this 8th day of January, 1999, a copy of the foregoing "Comments" was sent via First Class U.S. Mail, postage prepaid, to the following:

Charles W. Logan, Acting Chief *
Policy and Rules Division
Mass Media Bureau
Federal Communications Commission
2000 M Street, N.W.
5th Floor
Washington, D.C. 20554

American Community AM Broadcasters Association
One WMTA Drive
P.O. Box 973
Central City, KY 42330



Diane E. Bateman

* Via Hand-Delivery