

BEFORE THE  
**Federal Communications Commission**  
WASHINGTON, D. C. 20554

In re )  
 )  
Amendment of Sections 74.1235, )  
74.1231, 74.1232, 74.1233 and )  
74.1284 of the Commission's Rules )  
(Proposal for the Authorization )  
of FM Translators for AM Stations) )

RM-9419

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TO: The Commission

**REPLY COMMENTS OF**  
**CHRIS W. KIDD d/b/a KIDD COMMUNICATIONS**

Chris W. Kidd, d/b/a Kidd Communications, licensee of Standard Broadcast Station KTHO, South Lake Tahoe, California, hereby respectfully submits Comments in the above-referenced proceeding. Those comments are attached to this covering pleading.

Respectfully submitted,

**CHRIS W. KIDD d/b/a KIDD COMMUNICATIONS**

By 

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March 10, 1999

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REPLY COMMENTS ON PETITION FOR RULEMAKING

Submitted by Chris Kidd  
KIDD COMMUNICATIONS

Kidd Communications is the licensee of AM 590 KTHO, South Lake Tahoe, California. We submitted initial comments in this proceeding and the following is our general reply comments.

Many of the comments filled in favor of this proposal centered around the eligibility factor and which AM stations would qualify to apply for an FM translator. As stated in our initial comments, Kidd Communications believes that the criteria should be opened up to regional powered stations around 5,000 watts. Comments should be sought on this in a proposed rule making.

The purpose of the FM translators for AM stations is to recover areas of lost coverage at night. This would be done with a full time 24 hour a day fully simulcast FM translator. The translator should not be restricted to the licensee's AM tower, because in many cases, even at night, the AM signal is fine in the area around the tower. Many AM licensees will want to reach out into their coverage area with a transmitter site location where their AM signal is weaker at night.

A reasonable restriction could be that an AM translator applicant must demonstrate that a class A FM channel could not be allocated in or around their proposed translator site.

Some favorable comments have proposed changes in the allowed ERP. No changes in the current rules regarding power output are necessary. Part 74.1235, paragraph a, states that the allowed ERP for fill-in service is 250 watts. This power limitation is not governed by the height above average terrain.

One comment suggested that the translator rules be amended for AM daytime stations to allow for the origination of programming at night. Since the Commission has allowed AM daytimers to operate with a limited amount of watts at night ( i.e. 10 to 100 watts) the AM station will continue to

operate. Because of this, a change in the origination rules may not be necessary.

Negative comments have been received from other competing interests who would desire an FM translator license. It is likely that the approval of this proposal will result in a greater demand for FM translators. In a separate proceeding ( RM-9208 and RM-9242 LPFM) the Commission proposes to eliminate or reduce the second and third adjacent channel restrictions. If the Commission can apply the same theoretical reductions in spacing requirements for FM translators, this will satisfy the competing interests.

The NAB and Jacor opposed the proposal with a reference to IBOC. This is not a valid argument because part 74 services are subject to being "bumped" by a part 73 license. This is currently the case with LPTV.

The Commission cannot ignore the fact that an LPFM rule making is ahead of this AM/FM translator proposal. If approved, FM translators for AM stations will be one of the strongest forces in fostering localism. FM translators will be the vehicle to keep AM stations as a separate voice in the community. It will provide an opportunity of service to the public at night, that they have not received before.

The LPFM proposed rule making as written, should be retitled "The End of AM Broadcasting in America". On behalf of all AM stations, the undersigned respectfully requests expedited service on these comments. For AM broadcasting service to survive in America, it is absolutely necessary for this translator rule making to catch up with the LPFM rule making. Otherwise, the first will have a preclusionary effect on the second.

Should anyone desire to send comments to the writer, the address is:

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