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November 17, 2005

Secretary
FEDERAL COMMUNICATIONS COMMISSION
Office of the Secretary
9300 East Hampton Drive
Capitol Heights, Maryland 20743

**RE: Petition For Rulemaking To Boost Part 15 AM Power Levels To 1 Watt
[Related To Docket RM-11287]**

Dear Commissioners and Commission Staff,

Enclosed you will find an original and 14 copies of a Petition For Rulemaking, delivered by Federal Express. The Petition proposes to increase to 1 watt the maximum power levels for legal unlicensed AM stations that operate under Part 15.

I submit this Petition on behalf of the prime signatory: RADIO READY TO GROW (RRTG). This new advocacy group is composed of Part 15 AM stations which support a Low Power AM (LPAM) Radio Service, as contemplated in Docket RM-11287.

In addition to RRTG, the enclosed Petition has also been signed by all 5 parties to the August 19, 2005 Petition For Rulemaking that led to the initiation of Docket RM-11287. These 5 parties are THE AMHERST ALLIANCE of Michigan, THE MICHIGAN MUSIC IS WORLD CLASS! CAMPAIGN, THE LPAM NETWORK of New York State, Nickolaus E. Leggett N3NL of Virginia and myself (also of Virginia).

Also signing the enclosed Petition were REC NETWORKS of Arizona, DIYMEDIA of Illinois, PROVIDENCE COMMUNITY RADIO of Rhode Island, WRIR-LP of Virginia and Rain Madeline Burroughs of Virginia.

An electronic copy of the Petition is also being submitted today in Docket RM-11287, through the vehicle of Supplemental Comments filed by RADIO READY TO GROW.

is Frank Hansche, General Manager of EAST HILL RADIO in Metropolitan Seattle.

THE AMHERST ALLIANCE of Michigan (www.amherstalliance.net), THE MICHIGAN MUSIC IS WORLD CLASS! CAMPAIGN, THE LPAM NETWORK of New York State (www.lpam.net), Don Schellhardt, Esquire of Virginia and Nickolaus E. Leggett N3NL of Virginia are the 5 signatories of the August 19, 2005 Petition For Rulemaking to establish a Low Power AM Radio Service. This Petition is the subject of FCC Docket RM-11287.

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REC NETWORKS of Arizona (www.recnet.com) is a nationally known source of information, consulting services and advocacy for the entire Low Power Radio community of America -- which includes aspiring Low Power AM stations, current and aspiring Low Power AM stations, existing Part 15 AM stations and supporters of all of these existing or potential stations.

REC NETWORKS has recently invited Part 15 AM stations across the nation to contribute information about themselves to a national Part 15 AM database. The database is being built by REC NETWORKS on its Web Site.

DIYMEDIA (www.diymedia.net) of Illinois is a national journalistic service for the total Low Power Radio community -- and other pioneers of media reform. It is managed by John Anderson of the University of Illinois at Champaign/Urbana.

WRIR-LP of Virginia (www.WRIR.org) is a licensed Low Power FM station which serves the City of Richmond. With a potential audience of 250,000 listeners, WRIR-LP enjoys the second largest service area of any LPFM station in the nation.

PROVIDENCE COMMUNITY RADIO of Rhode Island is an applicant for a Low Power FM license to serve the City of Providence. The group is awaiting the resolution of a situation involving mutually exclusive LPFM

applications for a single available frequency: a scarcity which would be eased, if not eliminated, by the arrival of LPAM in Providence.

While PROVIDENCE COMMUNITY RADIO has existed informally since the 1990's, it formally incorporated itself following the establishment of the LPFM Radio Service in 2000. This gave PROVIDENCE COMMUNITY RADIO the distinction of being the first non-profit organization in American history to be incorporated for the sole purpose of acquiring a Low Power FM license.

Rain Madeline Burroughs of Virginia is a longtime civic activist. Since her arrival in Richmond several years ago, she has become a Board Member of the Oregon Hill Housing Information Center (OHHIC) -- which provides affordable housing in her Oregon Hill neighborhood -- and a leader in the Green Party of Virginia.

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The Linkage of Part 15 AM Stations to Low Power AM Stations

RADIO READY TO GROW and the other 10 Petitioners have been motivated to file this Petition by the ongoing string of Written Comments in FCC Docket RM-11287.

The existence and role of Part 15 AM stations was the centerpiece of the argument made against the LPAM in Written Comments filed by RANGEMASTER TRANSMITTERS, INC. of North Carolina. At the same time, Part 15 AM stations have been a central topic in the pro-LPAM Reply Comments filed by TUNETRACKER SYSTEMS, INC. of Wisconsin and Nevada's TALK RADIO OF PAHRUMP.

Part 15 AM stations have also featured prominently in the individual Written Comments submitted by RADIO READY TO GROW, the individual Written Comments submitted by Nikolaus E. Leggett N3NL and the Joint Written Comments submitted by WILW RADIO of New York State, THE LPAM NETWORK and 5 other parties.

It is clear by now that the fate of Part 15 AM stations is intimately interwoven with the FCC's consideration of a new LPAM Radio Service. The 11 Petitioners, all of whom strongly support the establishment of LPAM, believe it is incumbent upon them to offer a simultaneous proposal for strengthening the viability of Part 15 AM stations.

The Petitioners also note, and incorporate by reference, the November 8, 2005 Written Comments of REC NETWORKS in FCC Docket RM-11287.

Included within these Written Comments are the results of a very recent study by REC NETWORKS regarding the availability of frequencies for Low Power Radio stations, including LPAM stations, under various public policy scenarios. The study found that LPAM can bring Low Power Radio to *numerous* urban areas where it is presently absent, or almost absent -- *but* a handful of our largest metropolitan areas are likely to remain without *any* Low Power Radio stations, even if a new LPAM Radio Service is established and the current LPFM Radio Service is expanded significantly.

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For these few but enormous "Urban Frontier Areas", Part 15 AM stations appear to be the *only* way to accommodate Low Power Radio -- unless, of course, the Commission is willing to allow some displacement of existing stations that presently have Primary Service Status.

A Proposed Power Boost for Part 15 AM Stations

In response to these new developments, this 11-party Petition For Rulemaking proposes the initiation of a new policy for Part 15 AM stations:

Effective immediately, all legal unlicensed broadcasters on the AM Band, operating under Part 15, may increase their power levels to a maximum of 1 watt.

This change is intended to empower Part 15 AM stations to expand their broadcasts into any “community coverage vacuums” that remain unserved by current Low Power FM stations and/or future Low Power AM radio stations.

The same change is also intended to give these stations a new “safety margin” against possible erosions of their present service areas through interference from the In Band On Channel (IBOC) version of Digital Radio.

Inclusion of A Part 15 AM Power Boost
In the Coming Proposed Rule on Low Power AM

Due to the intimate linkage between *Low Power* AM radio stations and *Part 15* AM radio stations, the Petitioners have submitted the text of this Petition into the record of FCC Docket RM-11287, using November 17, 2005 Written Comments as a vehicle. In those Written Comments, we have asked the Commission to incorporate the proposals in our Part 15 AM Petition within the text of the coming proposed rule on Low Power AM.

Respectfully submitted,

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