

This is in response to RM 11338 that would allow AM licensees to use FM translators to retransmit its AM programming on the translator as a fill-in service.

The yardstick to which RM 11338 should be measured is whether or not it will benefit the public while not creating interference or causing problems with existing licensees.

The city limits (geographic boundaries) of many communities have dramatically grown beyond the city grade signal of the AM stations licensed to serve that city. This leaves citizens in peril when natural and manmade disasters strike. Useable AM service is also lessened with electrical interference from buried sensors that regulate traffic lights, power lines and metal utility poles that null and distort AM signals, RF leakage from cable television lines, along with a growing list of sources that often make AM signals difficult for the public to clearly receive.

In addition, AM broadcasters are the pioneers in locally focused programming. This includes on-air forums dealing with local issues, live coverage of council meetings, live play-by-play broadcasts of local sporting events and more. When storms approach, it is often only the AM radio station that stops regular programming to allow emergency responders in that city to inform the public about what safety precautions should be taken to protect their life, limb and property.

Since existing FCC regulations dealing with FM translators would be used, there would not be any interference created that would harm current FM licensees.

Furthermore, since AM licensees are often the most seasoned broadcasters, they have established a dependable track record of adhering to Commission regulations.

Therefore, using the criteria of whether or not RM 11338 will benefit the public while not creating interference or causing problems with existing licensees; and further strengthened by the fact that this proposed rule making was carefully prepared by the National Association of Broadcasters...I therefore fully support RM 11338, and encourage the Commission to move forward with speed to grant RM 11338 so that the public can be better served.