

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	RM-11338
Petition for Rulemaking of the)	MB Docket No. _____
National Association of Broadcasters to Permit)	
AM Radio Stations' Use of FM Translators)	

To: Secretary, FCC
For: The Commission

COMMENTS OF HUBBARD BROADCASTING, INC.

Hubbard Broadcasting, Inc. (“Hubbard”), by its counsel, hereby submits these Comments in support of the Petition for Rulemaking filed by the National Association of Broadcasters (“NAB”), proposing a limited use of FM translators by AM radio stations.¹ Hubbard, directly or through subsidiaries, has been the licensee of KSTP(AM), St. Paul, Minnesota since 1923,² and for three generations the Hubbard family has been a pioneer in the broadcasting industry. Hubbard also is the licensee, through a wholly-owned subsidiary, of WIXK(AM), New Richmond, Wisconsin and many other radio and television stations. Therefore, Hubbard is well qualified to offer a real-world perspective on the issues facing AM broadcasters today. It is based upon this broad experience that Hubbard writes in strong support of the NAB proposal.

Hubbard’s decades of experience with the AM service establishes that, while the AM service initially was the backbone of broadcasting for many years, the quality of the service has been harmed by congestion in the AM band. The Commission has acknowledged that problem

¹ See *Consumer & Governmental Affairs Bureau Reference Information Center, Petition for Rulemaking Filed*, Public Notice, Report No. 2782 (rel. July 25, 2006).

² KSTP(AM), formerly WAMD(AM), was the first advertiser-supported radio station in the country.

and expressed its concerns about AM band congestion for at least the past fifteen years.³

Various proposals for improving the service, such as the AM expanded band plan,⁴ have been adopted by the Commission, but unfortunately, they have not been as successful as broadcasters would like and the public deserves. Because of congestion, the coverage areas and quality of service of many AM stations have eroded over the years, and the AM service has become less competitive with other communications services, such as FM radio and, more recently, satellite radio. The erosion of AM coverage areas has made it difficult for AM stations to respond to shifts in population over time. With many people moving to outer suburbs in recent decades, population areas have shifted within the contour coverage areas of many AM stations, subjecting some listeners to degraded service.

Consequently, and consistent with the Commission's policy of adopting "innovative and substantial regulatory steps" to ensure the health and survival of the AM service,⁵ Hubbard believes it is in the public interest for the Commission to grant the NAB proposal. Allowing FM translator stations to be used to the limited extent proposed by NAB would help AM stations fill in gaps in existing service. Specifically, under the proposal, no portion of the 60 dBu contour of an FM translator station retransmitting an AM station could exceed: a) the 2 mV/m daytime contour of the AM station; or b) a 25-mile radius around the AM transmitter site, whichever is *less*.⁶ Used to this limited extent, FM translators would help ameliorate service voids, for both

³ See, e.g., *Review of the Technical Assignment Criteria for the AM Broadcast Service*, Report and Order, MM Docket No. 87-267, 6 FCC Rcd 6273, 6275 (1991) ("*Expanded Band R&O*"), recon. granted in part and denied in part, 8 FCC Rcd 3250 (1993).

⁴ See, e.g., *Implementation of the AM Expanded Band Allotment Plan*, Memorandum Opinion and Order, 15 FCC Rcd 17018 (2000), and cases cited therein.

⁵ *Expanded Band R&O*, 6 FCC Rcd at 6275.

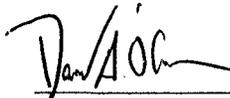
⁶ NAB Petition, at 1, 5, 7-8.

daytime and nighttime service, caused by overall congestion of the band and population shifts to areas with less reliable coverage due to nulls and terrain shadowing.

It is important to note what NAB has *not* proposed. FM translators would be used only for fill-in service, not for expanding service in any way. Indeed, this is a more limited use of FM translators than is permitted for full power commercial FM stations. Furthermore, under the proposal FM translators would be used only in analog format, not digital IBOC format. Finally, the NAB proposal is far more limited than the FM translator proposals previously considered and rejected by the Commission.⁷ For these reasons, Hubbard fully supports the NAB proposal and urges the Commission to expedite this proceeding in order to make a modest improvement to the AM service a reality as soon as possible.

Respectfully submitted,

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⁷ *See id.* at 10-14.