

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

In the Matter of)
)
An Inquiry Into the Commission's Policies) MM Docket No. 93-177
and Rules Regarding AM Radio Service)
Directional Antenna Performance Verification)

To: The Commission

COMMENTS

Communications Technologies, Inc. (“CTI”) hereby submits these Comments in response to the Media Bureau’s May 23, 2007 Public Notice in the above-captioned proceeding. *See* Public Notice, “Comment Sought on Proposed Rules Permitting Antenna Modeling To Verify AM Directional Antenna Performance,” (DA 07-2143, released May 23, 2007). In that Public Notice, the Media Bureau solicited comments on the recommendations of the AM Directional Antenna Performance Verification Coalition (the “Coalition”), submitted on May 4, 2007, that the FCC authorize the use of moment method computer modeling to demonstrate that AM directional antennas perform as authorized and to assess the effects of nearby reradiators on AM patterns. The Media Bureau also sought comments on the Coalition’s proposed new and modified rules that would implement the Coalition’s recommendations.

CTI is a member of the Coalition and enthusiastically supports both its recommendations in this proceeding and the new and modified rules it has proposed to implement those recommendations. As explained more fully in the Coalition's comments in this proceeding, computer modeling and internal array pattern monitoring will accurately and reliably verify the performance of most, if not all medium wave antenna systems, and will substantially reduce the time required of both applicants and Commission staff to perform a directional antenna proof of performance.

For the reasons set forth herein and in the Coalition's comments, **CTI** respectfully requests that the Commission authorize the use of moment method computer modeling to verify the performance of AM directional antennas and to evaluate the potential effects of nearby reradiators on AM patterns, and adopt the new and modified rules proposed by the Coalition.

Respectfully submitted,

Communications Technologies, Inc.

By: _____

Clarence M. Beverage
President

July 13, 2007