

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

Clear Channel Communications, Inc. ("Clear Channel") 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 ("MOM") to demonstrate that AM directional antennas perform as authorized and to assess the effects of nearby re-radiators 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.

Clear Channel 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.

Clear Channel has used this methodology to tune newly constructed arrays and has found that when the method is applied as in the rules proposed by the Coalition the result is an array that is properly adjusted the first time. Recent examples include WSCC(AM) in Charleston, South Carolina, and WTKT(AM) in Harrisburg, Pennsylvania.

In the case of WSCC, the array was sited on an island and field measurements were severely restricted by numerous land/water boundaries created by a series of barrier islands. The array as adjusted to MOM-derived parameters was found to be in proper adjustment.

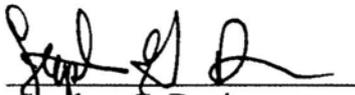
In the case of WTKT, the array was constructed adjacent to a mountain ridge that precluded meaningful field measurements in proximity of the array. As in the previous case, the array was adjusted to MOM-derived parameters as measured on a sample system constructed as described in the rules proposed by the Coalition. Field measurements that were corrected for proximity effects and measurements made well beyond normal measurement distances confirmed that the array was indeed in proper adjustment. These measurements were predominately made on foot over very rough terrain and at great expense. This effort was made to conform to the existing Commission rules and would have been unnecessary under the rules proposed by the Coalition.

For the reasons set forth herein and in the Coalition's comments, Clear Channel 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 re-radiators on AM patterns, and adopt the new and modified rules proposed by the Coalition.

Respectfully submitted,

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July 23, 2007

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