

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 )

**COMMENTS OF CARL T. JONES CORPORATION  
ON FURTHER NOTICE OF PROPOSED RULEMAKING**

Carl T. Jones Corporation ("CTJC") hereby submits these Comments in response to the Media Bureau's May 23, 2007, Public Notice in the above-captioned proceeding.<sup>1</sup> 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.

CTJC is a consulting engineering firm with extensive experience and expertise in the design, adjustment and proofing of AM directional antenna systems. CTJC is a member of the Coalition and was also a member of the *ad hoc* group that filed Comments and Recommendations in July, 2001, supporting the adoption Rules allowing the use of moment method computer modeling for antenna system verification. CTJC supports the Coalition's recommendations in this proceeding and the new and modified Rules it has proposed to implement those recommendations.

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<sup>1</sup> See Public Notice, "Comment Sought on Proposed Rules Permitting Antenna Modeling To Verify AM Directional Antenna Performance," (DA 07-2143, released May 23, 2007).

CTJC engineers have been using method moment computer modeling for the design and evaluation of directional antenna systems and the design and evaluation of specialized antennas for the past two decades. Over the past several years, CTJC engineers have been employing the techniques proposed by the Coalition for the setup and initial adjustment of directional antenna systems. Our experience using these techniques indicates that the methods proposed by the Coalition are sound. We urge the Commission to adopt the recommended Rule changes which would allow the use of moment method computer modeling in conjunction with impedance matrix measurements and comprehensive sample system verification for directional antenna performance verification.

Because of the dependence on internal measurements in the proposed verification process, we strongly urge the Commission to require each applicant to supply, as part of the FCC application, not only the modeling assumptions (input data file) and the modeled and measured impedance matrices that were used to establish the operating parameters, but also detailed information on the sampling system and sampling system verification measurements such that it is accessible electronically by the Commission staff as well as interested third parties.

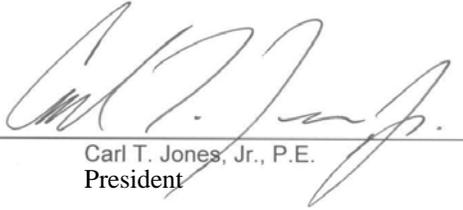
For the reasons set forth herein and in the Coalition's comments, CTJC respectfully requests that the Commission authorize the use of moment method computer modeling to verify the performance of AM directional antennas and to evaluate the potential effects of nearby reradiators on AM patterns, and to adopt the new and modified Rules proposed by the Coalition. We further request that the Commission adopt application filing requirements that would allow for an electronic record of, and public access to, data pertinent to the

determination of antenna system operating parameters and of data pertinent to the sampling system and sampling system verification.

Respectfully submitted,

Carl T. Jones Corporation

By:



Carl T. Jones, Jr., P.E.  
President

July 23, 2007