

***Before the  
Federal Communications Commission  
Washington, DC 20554***

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

Reply Comments of du Treil, Lundin & Rackley, Inc.

The firm of du Treil, Lundin & Rackley, Inc. (dLR) respectfully submits these Reply Comments in the above captioned proceeding relating to the *Inquiry into the Commission’s Policies and Rules Regarding AM Radio Service Directional Antenna Performance Verification*. dLR, and its predecessors, have provided consulting engineering services to the broadcasting industry for over 60 years including assisting broadcasters in preparing hundreds of applications for AM radio stations employing directional antennas.

dLR is a member of the AM Directional Antenna Performance Verification Coalition (herein “the Coalition”) and has participated in preparing the Coalition’s reply comments in this proceeding. While fully supporting the Coalition’s reply comments, dLR wishes to reply with additional information regarding the comments of RadioOhio, Incorporated (herein “RadioOhio”) and Broadcast Engineering and Equipment Maintenance Company (herein “Beem Co.”):

RadioOhio’s Comments Support a Separate Rulemaking

The comments of RadioOhio provide very informative material on the uncertainties of the present allocation process, which dLR believes adds to the information in the Coalition’s reply comments regarding the uncertainties of the field strength measurement process to support the concept of using moment method modeling to proof AM directional antennas. Further, the RadioOhio comments provide information on the plight of AM radio stations that must employ directional antenna

systems with null suppression that might be excessive considering the uncertainties that are inherent in the overall interference protection process. dLR believes that another look at the suppression requirements for designing AM directional antennas to provide protection to other stations is in order and urges the Commission to initiate a new rulemaking to consider that issue separately from this one.

#### Review of the “Rachet Clause” Should Be Considered in the Separate Rulemaking

The new rulemaking should specifically propose eliminating the following words, commonly referred to as the “rachet clause,” from footnote 1 of 73.182(q): *Those interferers that contribute to another station’s RSS using the 50% exclusion method are required to either reduce their contributions to that RSS by 10%, or to a level at which their contributions no longer enter into the 50% RSS value, whichever is the lesser amount of reduction.* The “rachet clause” is a serious impediment for stations wishing to make modifications to alleviate nighttime coverage difficulties such as are discussed in the RadioOhio comments.

Another reason that the “rachet clause” should be eliminated is that a Commission decision made subsequent to its addition to the Rules has invalidated the basis upon which it was adopted. In the Commission letter dated June 11, 1997, “In re: KIOQ(AM), Folsom, CA,” which denied a waiver of the 5 mV/m to 5 mV/m second-adjacent channel overlap rule despite higher nighttime interference-free levels at both of the stations involved, the Commission clearly explained that groundwave coverage, which is present 100% of the time, has primacy over signal levels calculated based on 10% of the time assumptions. As the “rachet clause” forces an AM station making a change to reduce its 100% of the time groundwave field strength in a certain direction to in turn reduce interference that theoretically occurs 10% of the time at another station, it is upside-down, in principle, from the doctrine employed in the KIOQ decision.

The “rachet clause” has the opposite effect of improving the interference-free signals of AM stations. Because power reduction is often the only remedy available for addressing its requirements when radiation must be decreased toward a station that receives theoretical interference 10% of the time and is located within the major lobe region of the existing nighttime directional antenna pattern, changes to improve coverage are discouraged and stations that unavoidably must make changes have to decrease their 100% of the time groundwave signals to do so.

Beem Co.'s Comments Regarding Field Strength Meter Requirement

dLR agrees with Beem Co. that each AM radio station using a directional antenna system should be required to possess and have readily available a field strength meter. This should be the case for stations licensed under the rules that apply to both field strength measurement proofs – for measuring field strengths at the monitor points specified on the station license – and to moment method modeling proofs – for measuring field strengths at the required reference locations.

Louis Robert du Treil, Jr, P.E.

John A. Lundin, P.E.

Ronald D. Rackley, P.E.

W. Jeffrey Reynolds

Charles A. Cooper, P.E.

du Treil, Lundin & Rackley, Inc.

201 Fletcher Avenue

Sarasota, Florida 34237

941.329.6000

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