Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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| In the Matter of | ) | |
| | ) | |
| An Inquiry Into The FCC's Policies and | ) | MM Docket No. 93-177 |
| Rules Regarding AM Radio Service | ) | RM-7594 |
| Directional Antenna Performance | ) | |
| Verification | ) | |

**REPLY COMMENTS OF**
**COHEN, DIPPELL AND EVERIST, P.C.**

The following reply comments are submitted on behalf of Cohen, Dippell and Everist, P.C. ("CDE") in the MM Docket No. 93-177 proceeding entitled, *"An Inquiry Into The FCC's Policies and Rules Regarding AM Radio Service Directional Antenna Performance Verification."* CDE or its predecessors located in Washington, D.C. have been providing consulting engineering services to the communications industry for over 65 years.

Donald G. Everist qualifications are as follows:

The undersigned is a graduate electrical engineer, a registered professional engineer in the District of Columbia (Registration No. 5714) and has practiced in that capacity of over 30 years. He is a member of the Institute of Electrical and Electronic Engineers, National Society of Professional Engineers, Illinois Society of Professional Engineers, and a member of past President of the Association of Federal Communications Consulting Engineers.

He was the Chairman of the AM Broadcasting Service Working Group preparatory to the 1979 World Administrative Radio Conference. He was an industrial delegate for the United

States to the International Telecommunications Union Regional Administrative Medium Frequency Broadcasting Conference in Buenos Aires, Argentina.

He was the Chairman of TF:F Planning Methods; was a U.S. delegate on the Fourth Panel of Experts meeting in Geneva, Switzerland; was Chairman of the Working Group on Inventories, Incompatibilities, Negotiations and Strategy to the Advisory Committee, all preparatory to the Second Session of the Regional Administrative MF Broadcasting Conference for Region 2.

He was an industrial to the Second Session of the Regional Administrative MF Broadcasting Conference for Region 2 (Western Hemisphere) held in Rio de Janeiro, Brazil.

He was an industrial delegate for the United States to the Regional Administrative Radio-Conference (BC-R21) sponsored by the International Telecommunications Union in Geneva, Switzerland.

He was an industrial delegate for the United States for the CCIR Joint Interim Working Party 8-10/1 Meeting in Helsinki, Finland.

All time and expenses were solely provided by this firm.

The undersigned has been making radiofrequency measurements since 1952 and joined the predecessor firm to Cohen, Dippell and Everist, P.C. in 1961. His first field assignment as a consulting engineer was in connection with commissioning a new four-tower daytime directional and six-tower nighttime directional AM array.

CDE has examined certain comments submitted in MM Docket No. 93-177 including the joint comments submitted by Greater Media, Inc. and Charles A. Hecht & Associates, Inc. ("Joint Comments").

CDE notes the information of the Joint Comments contained in Appendix B entitled, "Statement of Phasetek, Inc." and the undersigned based on 46 years of experience in this field is not unduly surprised by the conclusions provided therein.

CDE notes comments of the Joint Comments in Section B entitled, "The Field Experience of Greater Media and Others Does Not Support Unlimited Reliance Upon MoM", and is in part as follows:

> "Notably, none of the Greater Media arrays could be properly licensed based on MoM without additional system adjustment based on field measurements."

CDE believes that Greater Media is a serious group broadcast operator and has a highly experienced Technical Director, Milford Smith. Therefore, CDE urges the Commission to fully consider these comments as the comments are based on actual experience and should not be taken lightly.

Further CDE subscribes to Section C of the Joint Comments entitled, "A Hybrid Program Combining MoM and Limited Field Measurements Would Serve the Public Interest in Maximum Interference-Free AM Service While Conserving Station Resources", with two exceptions. CDE believes it should only apply to a single station transmitting at a site and the

system design parameters should have a "Q" factor significantly higher than the current standard "Q" factor.[1]

CDE offers support of Section D of the Joint Comments entitled, "Part 17 Rule Modifications". It fully shares the various comments expressed in Paragraphs 16, 17, 18, 19 and 20 of these Joint Comments. CDE finds noteworthy the comments in Paragraph 21 and adds that this firm has found the necessity to detune a FCC unregulated tower where the incident broadcast station field was approximately 100 mV/m.

Summary

CDE supports the hybrid concept by combining MoM and limited field measurements as being a more realistic approach to a very complex situation.

Respectfully submitted,

Donald G. Everist
District of Columbia
Professional Engineer
Registration No. 5714

September 7, 2007

[1]See Section 73.150 of the FCC Rules.