

Comments of Larry Langford

Owner of WGTO AM and WDOW AM

After close examination of the petition, it is clear that what is sought just makes good sense. The restriction on night power has always been based on the best method to provide protection for sky wave coverage of primary stations. At the time the rules were first written, using a dark to dawn method was the best way to ensure that protection was given. It was just not possible to do the calculations that are needed to provide hour by hour power changes. The instant petition would remedy that by allowing calculations to be done that would show a more precise time to start and end sky wave protection. I envision that this could open up several hours a day of higher power output from station now under severe restriction.

The power needed to perform these calculations can be found in almost any office computer. The fact the FCC was able to calculate the first two hours of PSSA power down to a resolution of one watt shows that such calculations can be handled and these were done in the late eighties! Computer power is much greater now.

On the issue of Pre Sunrise power. I think the 500 watt cap should be lifted at once, as long as no interference is given. For instance my station, WGTO shows

no limiting station in the Pre Sunrise Authority and allows the full 500 watts. If there is no limiting station why limit the power to 500 watts? Let the full power go into play at 6am as long as no limiting station is found. In this age of digital broadcasting and multicasting, it only makes sense to use the best available technology to ensure the most efficient use of the AM medium. The petition does just that by allowing us to cover the maximum area consistent with providing protection for those stations allowed to have secondary sky wave coverage. I have long said that it makes no sense to have a station in Chicago leave the air at local sunset to protect a station on the west coast where it will be daylight for at least the next two hours. We also know that darkness does not act like an instant switch that turns on sky wave. There is more to the phenomenon than that. Some good numbers crunching could help us all in this regard. I support the petition totally.

Larry Langford