



September 17, 2008

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

*Re: Notice of ex parte presentation, MM Docket No. 93-177*

Dear Ms. Dortch:

On September 16, 2008, Jacqueline McCarthy, Director of Government Affairs for PCIA—The Wireless Infrastructure Association (“PCIA”), Rich Biby, Publisher of AGL Magazine and Founder, CTO of Waterford Consulting, and the undersigned met in separate meetings with Rudy Brioché, Legal Advisor to Commissioner Jonathan Adelstein; Michelle Carey, Senior Legal Advisor to Chairman Kevin Martin; Rick Chessen, Senior Legal Advisor to Commissioner Michael Copps; and Rosemary Harold, Legal Advisor to Commissioner Robert McDowell.

During the meeting, PCIA representatives discussed PCIA’s suggested clarifications to the AM Coalition’s proposal for AM Detuning rulemaking in the above-captioned docket. These suggestions are detailed in the attached handout, which was also distributed to attendees.

Sincerely,

\_\_\_\_\_/s\_\_\_\_\_

Michael D. Saperstein, Jr., Esq.  
Public Policy Analyst  
PCIA—The Wireless Infrastructure Association

Enclosure

cc (by email):

Rudy Brioché  
Michelle Carey  
Rick Chessen  
Rosemary Harold



***In re: Proposed Rules Permitting Antenna Modeling to Verify AM Directional Antenna Performance***  
**MM Docket No. 93-177**

**Background**

- PCIA—The Wireless Infrastructure Association’s members own and manage more than 120,000 towers across the country that support all types of wireless, broadcasting and telecommunications services. PCIA’s goal is to facilitate the rapid deployment of wireless infrastructure.
- The AM Coalition’s proposal to apply computer modeling for AM stations includes revising procedures for assessing the effects of tower construction on AM stations, and consolidating these procedures in a new Part 17 rule.
- The proposed rules would require any commercial licensees (including CMRS providers) proposing construction of or “significant modification” to a tower or support structure in the “immediate vicinity” of an AM antenna system to examine potential effects to the system. Adverse effects would require detuning.

**PCIA’s Position**

PCIA supports the overall goal of applying computer modeling for AM Directional Antenna proofs. PCIA urges the Commission to take action on the AM Coalition’s Part 17 proposal in order to clearly define obligations and bring regulatory certainty to the wireless infrastructure industry.

**Simple Clarifications Can Ease Industry Burdens**

PCIA respectfully asks the Commission to make the following clarifications. Doing so will not affect AM station performance and will ease the overall burden on the telecommunications facility industry:

- Define “significant modification” to include “any change that would increase the structure’s physical height by 5 electrical degrees or more.”
  - For example, 5 electrical degrees would equal 19.5’ for a station operating at 700kHz
  - Allows for the simple addition/subtraction of most antennas without triggering an unnecessary effects analysis.
- Include available charts (such as attached) in the “immediate vicinity” definition, allowing for a simpler analysis as to when a tower is in the immediate vicinity of an applicable AM antenna.
- Allow an industry working group to best determine the “moment method analysis” and other associated best practices.

**“IMMEDIATE VICINITY” DEFINITION CHART**

| <b>AM Freq<br/>(kHz)</b> | <b>Wavelength<br/>(M)</b> | <b>Wavelength<br/>x 10 (kM)</b> | <b>60 EI Deg<br/>Ht (ft)</b> | <b>45 EI Deg<br/>Ht (ft)</b> |
|--------------------------|---------------------------|---------------------------------|------------------------------|------------------------------|
| 540                      | 555.56                    | 5.56                            | 304                          | 228                          |
| 550                      | 545.45                    | 5.45                            | 298                          | 224                          |
| 600                      | 500.00                    | 5.00                            | 273                          | 205                          |
| 650                      | 461.54                    | 4.62                            | 252                          | 189                          |
| 700                      | 428.57                    | 4.29                            | 234                          | 176                          |
| 750                      | 400.00                    | 4.00                            | 219                          | 164                          |
| 800                      | 375.00                    | 3.75                            | 205                          | 154                          |
| 850                      | 352.94                    | 3.53                            | 193                          | 145                          |
| 900                      | 333.33                    | 3.33                            | 182                          | 137                          |
| 950                      | 315.79                    | 3.16                            | 173                          | 129                          |
| 1000                     | 300.00                    | 3.00                            | 164                          | 123                          |
| 1050                     | 285.71                    | 2.86                            | 156                          | 117                          |
| 1100                     | 272.73                    | 2.73                            | 149                          | 112                          |
| 1150                     | 260.87                    | 2.61                            | 143                          | 107                          |
| 1200                     | 250.00                    | 2.50                            | 137                          | 103                          |
| 1250                     | 240.00                    | 2.40                            | 131                          | 98                           |
| 1300                     | 230.77                    | 2.31                            | 126                          | 95                           |
| 1350                     | 222.22                    | 2.22                            | 121                          | 91                           |
| 1400                     | 214.29                    | 2.14                            | 117                          | 88                           |
| 1450                     | 206.90                    | 2.07                            | 113                          | 85                           |
| 1500                     | 200.00                    | 2.00                            | 109                          | 82                           |
| 1550                     | 193.55                    | 1.94                            | 106                          | 79                           |
| 1600                     | 187.50                    | 1.88                            | 103                          | 77                           |
| 1650                     | 181.82                    | 1.82                            | 99                           | 75                           |
| 1700                     | 176.47                    | 1.76                            | 96                           | 72                           |
| 1750                     | 171.43                    | 1.71                            | 94                           | 70                           |

Example: A tower is in the “immediate vicinity” of an AM directional station operating on 700 kHz if it is (1) within 4.29 kilometers of the AM station and (2) is 176 feet or higher. Thus, a tower that is further than 4.29 kilometers, or less than 176 feet in height, is not considered to be in the immediate vicinity of an AM directional station operating on 700 kHz, and thus no further analysis would be required.