



ASSOCIATION OF

FEDERAL COMMUNICATIONS CONSULTING ENGINEERS

WASHINGTON, D.C.

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Section 73.215 of the)	RM-11620
Commission's Rules related to)	
Contour Protection for Short Spaced FM)	RM-11643
Assignments)	

**Comments of the
Association of Federal Communications Consulting Engineers
Washington, D.C.**

The Association of Federal Communications Consulting Engineers (AFCCE) is a professional membership organization whose members are professional engineers serving as consultants to communications entities and clients, primarily those licensed by the Federal Communications Commission, and responsible engineering executives of such entities.

AFCCE has provided input to the Commission during its more than 60 years of existence on important technical and regulatory issues. AFCCE now wishes to comment on the Petitions for Rulemaking (RM-11620 and RM-11643) captioned Amendment of Section 73.215 of the Commissions Rules and Regulations Contour Protection for Short-Spaced FM Assignments and Amendment of Section 73.215 of the Commission's Rules related to Contour Protection for Short Spaced FM Assignments (the Petitions) as submitted by Calvary Chapel of Costa Mesa and SSR Communications, Inc., respectively.

AFCCE, through its Rules and Standards Committee, acknowledges that application of the Rule Section (72.215) cited in the petitions may result in anomalous conclusions in situations where the Class Maximum HAAT is employed in calculations of predicted interference scenarios as required by Section 73.215 but where the terrain (ground elevation) is such that the maximum allowable HAAT for the Class



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is unavoidably exceeded; this typically occurs in antenna sitings in mountainous terrain. Due consideration should be given to amending this rule to eliminate the anomalous results created by application of the current rules in these cases.

AFCCE recommends that the Commission issue an NPRM proposing rule changes that will address this problem. AFCCE notes that it is not necessarily endorsing the specific changes recommended in either Petition at this time and suggests that the Commission give due consideration to these recommendations as well as to alternative proposals it may devise; also, the input from interested parties during the NPRM response period will likely assure that all possible approaches will be fully considered in seeking a technically sound solution.

Respectfully submitted,

**ASSOCIATION OF FEDERAL
COMMUNICATIONS CONSULTING
ENGINEERS**

by John F.X. Browne, P.E.
Chairman, Rules & Standards Committee
October 25, 2011