

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

In the Matter of )  
)  
Petition for Rulemaking by )  
SSR Communications, Inc. )  
) RM-11643  
Amendment of Section 73.215 of the )  
Commission’s Rules Related to Contour )  
Protection for Short Spaced FM Assignments )

**COMMENTS OF GREATER MEDIA, INC.**

Greater Media, Inc. hereby provides comments with respect to the above-captioned Petition for Rulemaking (“Petition”). In the Petition, SSR Communications, Inc. requests the Commission to eliminate the minimum distance separation standards currently used for the allotment and modification of non-reserved band FM radio stations and instead apply the contour protection mechanism used for reserved (non commercial educational) FM stations. Greater Media, through subsidiaries, is the licensee of 22 radio stations located throughout the country, of which 18 are FM stations. For the reasons set forth below, Greater Media supports the comments in this proceeding submitted by the National Association of Broadcasters (“NAB”) and respectfully requests that the Commission dismiss the Petition.

As NAB’s Comments explain, the existing allocation scheme for non-reserved band FM allocations, which is based on minimum distance channel separation standards, has enabled the commercial FM service to expand in a manner that preserves the integrity of the band, and allowed for improvements that enable FM stations to better serve their communities. In contrast, the contour protection mechanism, which is used for the AM and NCE reserved band FM

services, has resulted in services that are overly congested and prone to interference. Significantly, if the Commission were to adopt the changes to the allocation scheme for the commercial FM service that Petitioner proposes, additional stations could be shoehorned into communities that are often already crowded, which would create more interference to the service areas of existing stations and impair the ability of stations to modify their facilities to better serve the needs of their communities. *See NAB Comments* at 4-7. Petitioner's claim that the requested change would not harm existing stations because all of the FM licensees planning to improve their facilities to operate with maximum facilities for their class would have done so already is entirely speculative and belied by evidence of the numerous applications requesting authorization to construct improved facilities that are filed on a regular basis. Further, this claim ignores the fact that construction permits for new commercial FM stations continue to be awarded through auctions. *Id.* at 8.

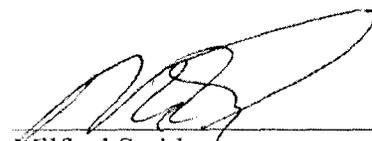
NAB's comments also demonstrate that implementation of Petitioner's proposal could negatively impact the continuing rollout of HD Radio digital broadcasting. The Commission recently recognized that increasing the power of HD radio stations is important to improving coverage of HD stations and to better enabling the HD radio service to meet its full potential. *Digital Audio Broadcasting Systems and Their Impact on the Terrestrial Radio Service*, MM Docket 99-325 (2010). As NAB explains, the ability of stations to implement the full 10dB power increase depends on the proximity of first adjacent channel stations, and allowing FM stations to be allocated based on a contour protection scheme would likely result in more closely spaced first adjacent channels, which would limit the number of stations that would be able to utilize the full 10 dB power increase. This result would harm the public interest by limiting the ability of listeners to receive new digital radio services. *See NAB Comments* at 8-10.

For the reasons set forth herein, Greater Media respectfully requests that the Commission dismiss the Petition without prejudice.

Respectfully submitted,

GREATER MEDIA, INC.

By:

  
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