



May 15, 2013

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Via Electronic Filing

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

**Re: Notice of *Ex Parte* Communication
MB Docket No. 09-182 (2010 Quadrennial Review)
RM-11560 (Ratchet Rule Repeal)**

Dear Ms. Dortch:

On May 13, 2013, Jeff Littlejohn, Executive Vice President - Engineering & Systems Integration, Clear Channel Media + Entertainment (“Clear Channel”), Jessica Marventano, Senior Vice President, Government Affairs, Clear Channel, and the undersigned, met with Commissioner Ajit Pai and his Chief of Staff, Matthew Berry.

Mr. Littlejohn discussed the engineering and policy background of several proposals to revitalize the AM broadcast service, focusing on four initiatives:

Repeal of the “Ratchet Rule” (47 C.F.R. Section 73.182(q), Note 1). Mr. Littlejohn explained that the “Ratchet Rule” had done little to improve interference issues in the AM band, while serving as an impediment to improvements or necessary relocations of AM stations, and thus Clear Channel supports the engineering community’s initiative to eliminate the rule.

Relax AM Community of License Coverage Requirements. Mr. Littlejohn explained that many AM stations were initially located on the edges of cities, whose boundaries since have often expanded, and thus relocation options are hindered by the current community of license coverage requirements. Therefore, Clear Channel supports the relaxation of the community of license coverage requirements to 80% of the community by the 5 mV/m daytime contour and 50% of the community by the nighttime interference free contour. While Clear Channel supports such relaxation, it does not, however, support the elimination of nighttime coverage requirements by AM stations altogether, as that would disserve the public’s expectation of service to their community.

FM Translator Window/STAs for AM Stations. Mr. Littlejohn noted that Clear Channel's experience has shown that FM translators rebroadcasting AM stations increase listenership to the rebroadcast AM station, and have served to encourage listeners usually accustomed to the FM band, including young adults and females, to tune directly to the AM band. Mr. Littlejohn noted Clear Channel's endorsement of opportunities for AM stations to apply for new FM translators, both during an AM licensee-only filing window prior to an LPFM window and on an on-going basis, such as through a special temporary authority process, as AM stations transition to all digital broadcasts and/or other spectrum.

Revise Location Limits for FM Translators Rebroadcasting AM Stations. Mr. Littlejohn suggested that the current restrictions on the area to locate the transmitter for an FM translator rebroadcasting an AM signal be reformed to either eliminate the 25 mile radius requirement altogether or to change the location requirement to sites *either* within the AM station's 2 mV/m contour *or* 25 miles from the AM transmitting site.

Other Topics Discussed. In response to a question from Commissioner Pai, Mr. Littlejohn stated that it would be challenging for the Commission to set a date certain to convert AM stations to all digital broadcasts, given the investments necessary for such a transition by broadcasters, and on the reception side, the large percentage of analog radios in the market. Mr. Littlejohn answered Commissioner Pai's question regarding the feasibility of across-the-board power increases for AM stations, by noting Clear Channel's opposition, explaining that when the Commission implemented such a power increase for Class IV stations in the past, it resulted in a sea of interference surrounding islands of service. In response to Mr. Berry's inquiry regarding the proposal of replacing the AM minimum efficiency standard with a minimum radiation standard, Mr. Littlejohn noted that any such change would need to be carefully designed to prevent additional signal from entering into the skywave, which would create more interference. In response to a query as to anti-skywave antennas, Mr. Littlejohn stated that international testing to date had not proven their effectiveness. Mr. Littlejohn responded to an inquiry regarding potential alterations in the timing of AM daily power reductions, noting that such requirements are based in physics and should not be altered without considering the impact on interference. Mr. Littlejohn noted that other spectrum, such as the Channel 5 and 6 bands, could be an eventual location for AM, LPFM and educational stations, with an engineering solution for incumbent TV stations in those bands. In the interim, FM translators would serve as a bridge until the transition to new spectrum and/or the transition to all digital AM broadcasts.

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Respectfully submitted,

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By: 

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cc: Commissioner Ajit Pai (via e-mail)
Matthew Berry (via e-mail)