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

In the Matter of

Revitalization of the AM Radio Service

MB Docket No. 13-249

This is a comment regarding the NPRM #13-249 regarding the "Revitalization of the AM Radio Service". This comment is from Brian and Karla Winnekins, owners of WRDN-1430AM in Durand, WI.

We would like to come out in support of the proposals that would allow existing AM stations a filing window for an FM Translator. We also agree that the translator should be assigned permanently to the AM station to prevent speculation of the translators which is happening across the country now with the current rules. In fact a translator in Alma, WI (W206BA/89.1) recently sold for \$75,000 so it could rebroadcast an AM signal. If the speculation is allowed to continue, most AM stations like ours would be priced out of the market, or it would be more economical to just find a Full-Service FM Construction permit and move that into our area. Our only concern with this proposal, is what about stations that are in area's that have limited or no available FM frequencies and multiple AM stations? How will the commission decide whom would get a frequency and whom would not?

We are also in support of the proposed repeal of the ratchet rule. We would however like to make sure that the relaxing of the ratchet rule, would allow stations like ours the opportunity to apply for an increased night time power. Our biggest complaint we receive from advertisers and listeners is why can't they receive us at night, and they live in our City of License. I would like to direct the Commission to the press release of June 10, 2013 and the attached letters from area citizens about the need for improved night-time service. We feel that while back in the 1930's it was critical to have large AM signals at night, we now have enough local service to cover the majority of the country that the protection of those signals is no longer needed. While it is incredible to hear St. Louis, MO in Durand, WI at night, it is pretty well understood that the St. Louis station will not be covering the Durand, WI area with EAS coverage as its not their market. So why should those in the Durand, WI area lose their primary service at night because of a rule from the 1930's? If the relaxation of the ratchet rule would not make it easier for an increase in night-time power, we would like to suggest the following: The commission would

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allow for a test from September 1, 2013 through March 31, 2014 an increase in power to 1,000 watts or their regular daytime power, whichever is LESS until 10pm local time for those stations that are forced to lower power at night. This would give the commission some "real world" results on possible interference increases while at the same time give local owners the opportunity to develop some local programming, (i.e. High school sports coverage), during the evening hours. Also, if this proved to be workable, the need for FM translators would decrease because many stations would have dependable night-time service for their City of License.

While we are not in danger of losing our tower site, we would come out in support of the other proposals that would make it easier for those stations that have to move due to no fault of their own.

Finally, we would like to also offer the following suggestions to help improve AM service:

1. We would like to see the Commission begin to enforce the Part 15 interference rules for consumer electronics. We are starting to see more interference from the new compact fluorescent lightbulbs, computer monitors, power adapters and even new TV's. We do understand that this will be hard to enforce products that are already in homes across the country, but we feel the Commission needs to get this under control.
2. Moving back Pre-Sunrise Authorization to 5am. With the 24-7 world we live in now, we believe many AM Station like ours are at a disadvantage because we are not allowed some decent power at a very critical time of the day.
3. Expand the broadcast bandwidth. We believe the current NRCS Standards, coupled with low cost radio receivers have made the AM Band difficult to listen to. If the bandwidth could be returned to 15kHz and the radio manufacturers will allow more bandwidth to be received it could improve some reception quality and attract new listeners.
4. Encourage the radio manufacturers to produce a better product. While we understand the Commission has no authority to force radio manufacturers to produce radio receivers to a specific quality, we would hope the Commission could at least work with radio manufacturers to come up with some basic standards for receivers.
5. Testing of other digital platforms. While there has been a full digital test of IBOC on the band, we believe there should also be tests of DRM and other digital platforms. We feel the Commission should encourage these tests and allow broadcast engineers to examine the results and also try possible solutions to work through the current issues with IBOC and other digital platforms.
6. We feel the current requirement to have overlapping coverage when moving a current FM translator should be eliminated. By doing this, stations like ours could also just find a current translator that was for sale, buy the license and move it to our area without the "hopping" that is going on now. It would be much more efficient use of resources.
7. We believe that there should be a way for stations like ours to be able to transition over to a full power FM. If we are able to find a full power FM frequency that would cover our daytime listening area, we believe that we should be able to apply for that frequency

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without going through the auction process. We also believe there should be restrictions that include: The AM license must be turned in 3 months after the license-to-cover for the FM is issued, the construction permit for the FM cannot be sold, and the FM cannot be moved from the City of License. We believe that with these restrictions, it will prevent the cherry picking of smaller stations with the sole purpose of moving them to metro areas. By allowing those AM stations that can move to a full power FM, we feel that it would then also help the remaining stations on the AM band to be able to upgrade their day or night time power, and there would be reduced interference at the same time.

While we understand that not all of our proposals would be considered, we would like to thank the Commission for taking time to read our comments and for taking time to address the issues affecting the AM Band.

Sincerely,



Brian Winnekins
Co-Owner
WRDN-AM
Durand, WI



Karla Winnekins
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WRDN-AM
Durand, WI