Federal Communications Commission
FCC 13-249

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

In the Matter of:	)	
	)	
The Revitalization of the AM Radio Service	)	MB Docket No. 13-249
	)	
	)	

Comments/Proposals of The RAFTT Corporation

The RAFTT Corporation ("RAFTT"), which along with limited partner JLF Communications, LLC is licensee of AM Station KULF (FCC ID: 48653)(1090 kHz, 1.0 kW, DA-D) at Bellville, Texas and through a Time Brokerage Agreement ("TBA") provides programming on AM Station KBRZ (FCC ID: 12156) 1460 kHz, 5 kW-D, 0.120 kW-N) and affiliated translator K236AR (FCC ID: 142962)(95.1 mHz, 0.99 kW, 254.9 HAAT), both at Missouri City, Texas offers comments on various aspects the above cited Docket styled the "Revitalization of the AM Radio Service" and offers proposals it believes would further the proposed revitalization of the AM band and provide additional opportunities for AM broadcasters to serve their Community of License ("COL"). Each proposal is simple and each is offered after many decades of experience operating AM stations and now FM translators in both small markets and among the largest markets in the United States.

Proposed Deletion of the Twenty Five Mile Limit on FM Translators

As currently constituted, the limits on locating an FM translator which is to be associated with an AM is site limited to the lesser of the AM's Daytime 2 mV/m contour or 25 miles (40.23 km) distance to the translator's 60 dBu contour ("the 25 mile limit"). RAFTT proposes the Translator Limit of 25 miles (40.23 km) be completely eliminated as it places an artificial barrier on many broadcaster's ability to make maximum use (or in some cases, any use at all) of the translator. There is sound reasoning underpinning this change.

Especially impacted by this rule are those translators associated with AM stations whose AM sites are in comparably good ground conductivity as determined under *Figure* 8 of 47 CFR Section 73.190 (figure M-3) of the Commission's. While placing limits on stations in relatively good conductivity, all but a few AM broadcasters in relatively poor ground conductivity produce 2 mV/m Daytime contours that travel more than 25 miles (40.23 km) making the 2 mV/m contour of these stations the limit, rendering the Translator Limit of 25 miles meaningless. Restricting the 60 dBu contour of the translator to not extend beyond the 2 mV/m Daytime contour of its sister AM is a reasonable standard in that the generally accepted industry standard for an "interference free" Daytime signal on AM is the 2 mV/m groundwave contour. The accepted "interference free" contour of translators and full power FM's alike is the 60 dBu contour. Therefore, the associated limit of the translator and the AM should be the the 60 dBu of the translator at the 2 mV/m of the AM as the only siting limit attached to translator antenna placement when translators are used as fill in service for AM.

Under its own criteria, the Commission encourages AM sites to be located in rural settings away from densely populated areas. An AM transmitter site that is located in relatively good ground conductivity means the site is often located well outside the station's Community of License ("COL"). As a result, the 25 mile 60 dBu limit places many AM licensees in a catch-22 position. If placed for

instance, on one of its AM towers, the translator may not have sufficient signal to cover the station's COL. If placed on a rental tower somewhere away from the AM site, the 60 dBu signal of the translator often falls outside the 25 mile limit but well within the 2 mV/m Daytime contour of the AM The station could comply if the siting limit is the 2 mV/m Daytime contour but is hobbled by the arbitrary 25 mile limit. The real world is replete with examples of both good and poor ground conductivity situations which demonstrate the barrier imposed by the 25 mile limit and the value and common sense of the 2 mV/m the only siting limit on AM affiliated translators.

One of the best examples of the problem with the 25 mile limit is KFRM AM (FCC ID: 25808) (550 kHz, 5 kW-D, 0.110 kW-N, DA-1) licensed to Salina, Kansas. This station sits in the middle of M-3 conductivity of 15 mmHos/m. The Daytime 2 mV/m of this 5 kW Class D AM station travels a distance of more than 250 km (150 miles) in the main lobe of the station's pattern. That is more than 200 km beyond the "lesser" 40.23 km (26 mile) 60 dBu translator limit. KFRM places a 2 mV/m Daytime contour over more than half the state of Kansas and its transmitter site is a long way from its COL. Salina, Kansas, KFRM's (COL). In fact, Salina is more than 65 km (40.7 miles) southeast of the KFRM transmitter site. The 25 mile (40.23 km) 60 dBu translator limit means that under no circumstance could this AM station utilize a translator to augment its signal within the limits of its own COL (See: Figure: 1), let alone the massive additional distances represented in its 2 mV/m daytime coverage area. The KFRM Daytime 2 mV/m contour covers a population of slightly more than a million people (1,024,609). The 2010 U.S. Census shows there are only 9,759 persons living within a 25 mile (40.23 km) radius - (and null side 2 mV/m) of the station's very rural transmitter site. The catch 22 scenario described above is very real for this station. Were the licensee to comply with the 25 mile limit on a translator sister to KFRM, that translator would place a 60 dBu contour over less than 1% of the Station;s 2 mV/m Daytime coverage area and come nowhere near its COL.

The answer to this dilemma is simple: KFRM should have the leeway to place a translator anywhere within KFRM's 2 mV/m Daytime contour so long as the 60 dBu of the translator does not extend beyond its 2 mV/m contour. Unfortunately, the arbitrary 25 mile limit means that not only is there no way for KFRM to make use of a translator but given the potential population it would cover, no reason to even ponder a translator as it would be limited to covering only a tiny fraction of KFRM's potential audience. And, while one can make the argument that the KFRM situation is unique because its signal benefits from both good conductivity and its 550 kHz dial position, higher dial position examples are also available.

In the Houston metro for instance, is KGOW (FCC ID: 17389) operating on 1560 kHz with a Daytime power of 46 kW licensed to Bellaire, Texas. KGOW's daytime site is located 42 km south of its COL (See: Figure: 2) As with the low dial position KFRM, the KGOW daytime transmitter site is much too far for a translator to be of any use within its COL. The population within a 25 mile radius of KGOW's transmitter site and its 2 mV/m contour on its null side is 913.459 people. The population within its overall 2 mV/m Daytime contour is 5,610,837. To say the least, KGOW is "hampered" in making the most of a translator given the current 25 mile site selection limits on translators. And, there are hundreds of examples like the two above.

It is acknowledged by RAFTT that translators are not required to place a particular amount of signal over their COL's; hence, their general relation to a particular COL is of no relative importance insofar as the rule of COL coverage goes. This in fact, augurs in favor of ridding the rules of the 25 mile limit. If a translator used in conjunction with an AM need not place a particular contour over a COL and if a translator need not be concerned with received interference, then why have an arbitrary rule that a translator's 60 dBu contour fall within 25 miles of its affiliated AM site? It is an established industry norm that an AM's 2 mV/m contour demonstrates its "interference free" service area during daylight

hours. Ditto that of the 60 dBu contour of a full power FM. Then common sense argues that the limit for the 60 dBu contour of an FM translator should be established as the conforming limit of the translator's "interference free" coverage as juxtaposed to that of its affiliated AM.

The two cases cited above illustrate two AM stations on opposite ends of the dial facing the same obstacle: the artificial limit of the 25 miles to the translator 60 dBu. But the problem can be demonstrated yet further, It even comes into play with low power Class C (formerly, Class IV) stations located in relatively good ground conductivity. Take for instance, KTEM (FCC ID: 63200) in Temple, Texas, a Class C operating with 950 watts on 1400 kHz. KTEM is located in an area of excellent inland conductivity (M-3 of 30 mmHos/m) and enjoys a 2 mV/m Daytime contour that travels nearly 70 km in some directions (See: Figure: 3). To place a 25 mile limit on KTEM's potential FM translator contour is to arbitrarily place yet one more wall in front of a station already facing the massive impediments all Class C AM's face every day. KTEM's 2 mV/m daytime contour is a far better alternative. There is hardly a way for the licensee to take undue advantage of the situation with the 2 mV/m contour as its only limit. By making KTEM's 2 mV/m contour the limit of a translator's 60 dbu contour, KTEM's real world market isn't increased at all but its options for placing the translator where it can do the most good at enhancing the AM ability to compete is multiplied many times. Doing so only gives KTEM's licensee one more tool to enhance the station's competitive reach in a market it already serves with its 2 mV/m contour.

And what about stations in relatively poor conductivity? While doing away with the 25 mile limit for AM stations in good conductivity is very important, it means little or nothing at all to stations in poor conductivity. For instance; WLTA (FCC ID: 42660) is another Class C AM operating on 1400 kHz, this one in Alpharetta, Georgia (the Atlanta metro). At no point does WLTA's 2 mV/m Daytime contour travel more than 13 km (8 miles) from it's transmitter site (See: Figure: 4), far less than half the distance

to a 25 mile (40.23 km) artificial translator signal limit. Again, using the AM 2 mV/m groundwave contour as a 60 dBu translator contour limit renders the 25 mile limit meaningless. This proves true of most stations in poor conductivity regions of the country.

In fact, in poor conductivity, even a Class I AM station fails to require the 25 mile translator contour limit. An excellent example is found in WTIC (FCC ID: 66464) (1080 kHz, 50 kW, U, DA-N) in Hartford, Connecticut. Due to slight conductivity changes in an overall environment of very poor conductivity, the 2 mV/m Daytime contour of WTIC travels between 41 and 47 km with an average of around 43.5 km or just slightly beyond the 40.23 km (25 mile) current translator contour limit. Remember, this is a 50,000 Watt Class I-B station utilizing an antenna system near the upper limits of efficiency. The 25 mile (40.23 km) distance limit places only marginal limits on translator placement in most parts of WTIC's day coverage. A quick examination of FCC Figure M-3 shows that lower power, higher dial position AM stations throughout the northeast, southeast, Florida, Appalachian and Rocky Mountain regions don't come close to requiring a 25 mile 60 dBu translator limit. By dent of their 2 mV/m contours, the 25 mile limit is meaningless to them.

Thus the 25 mile limit for translator contours is almost everywhere arbitrary and works well almost nowhere. It serves as a well-intended but fatally flawed bit of rulemaking. It fails to take into account the wide difference in distance to the 2 mV/m contour in different parts of the country. It fails to recognize the unnatural limits placed on the very natural relationship between the 60 dBu contour of the translator and the Daytime 2 mV/m of the AM. It limits or in some cases even erases the ability for many AM's, that through nothing they can control (groundwave conductivity), have longer distances to their 2 mV/m contour while being meaningless for those stations in poorer conductivity. It is a needless brake and a burdensome rule which should be eliminated.

It is therefore RAFTT's proposal that the limiting relationship between translator and AM contours be that the 60 dBu contour of a translator not extend beyond the 2 mV/m daytime contour of the AM station as determined by Figure M-3 of the rules.

Mattoon Waivers Should Remain

In its request for comments, the Commission seeks comments on the usefulness of the so-called "Mattoon Wavier." RAFTT believes Mattoon Waivers are in fact, very useful and should be codified as part of the instant rulemaking. The Mattoon Waiver allows an AM applicant a reasonable degree of latitude in relocating a translator transmitter site while remaining a minor change to the translator facilities. RAFTT submits that precedents have been established in Mattoon Waivers already granted which, being codified in the instant rulemaking will provide a roadmap for AM licensees considering the acquisition of previously licensed translators. As RAFTT understands it, previously granted Mattoon Waivers have established a four step process to qualify for the waiver, one of which RAFTT submits is no longer applicable as discussed below.

In simple form, those steps are and should be that 1.) the applicant demonstrates that it does not have a history of filing "serial" minor modification applications (the so-called "hopping") of translators in order to dramatically alter the market served by the translator; 2.) the proposed facility is mutually exclusive with its licensed facility using the contour protections (60/40 dBu overlap) required of full service FM's as the basis for determining mutual exclusivity; and, 3.) while not alone being dispositive, the translator will rebroadcast an AM station.

The fourth prerogative has been that the proposed move does not implicate LPFM spectrum scarcity concerns. RAFTT believes the now closed LPFM filing window renders this step superfluous and proposes that it would needlessly clutter the process and is rendered mute by the recent LPFM filing window. RAFTT's position is that the LPFM filing window was a long time in coming and very well

publicized; hence, any party wishing to apply for a Low Power FM facility has most recently had the opportunity to do so. Such a requirement for translators to protect LPFM opportunities in the distant future is unnecessary and burdensome.

Limits on Numbers of Translators Attached To AM Stations

If there is agreement that one of the keys to AM revitalization is the use of FM translators, then there should be a discussion as to how many translators may be used by an AM. Again, RAFTT proposes that the limit of the 60 dBu of a translator coincide with the 2 mV/m Daytime contour of its sister AM. Though not true in many cases, the KFRM example above, demonstrates many AM 2 mV/m contours travel well beyond the limits of any one translator which leaves the AM licensee with the question of where to place a translator, if one is the limit, in order to profit most by its addition to the AM signal. RAFTT proposes the limit be as many translators as are technically feasible in order to fill the AM 2 mV/m contour with 69 dBu translator signal without needless overlap of translator signals.

In addition, RAFTT's experience with translators, though limited to only one in one market is that while the translator is certainly an asset, it only vaguely resembles a full power FM and that all the challenges faced by a full power FM are visited on and amplified with the lower powered FM translator. As a result, one translator may not be sufficient to provide the assistance necessary to make an overlay to the AM 2 mV/m signal possible.

As a class II service, the translator is allowed to accept interference from co and adjacent channel stations well above that allowed under full service rules. This situation being typical, most translators have interference from co-channel 40 dBu contours far inside their 60 dBu contour. First, Second and Third adjacent interference issues are abundant as well. RAFTT's experience is that a translator signal can easily be so saturated with interference that it is nonexistent at the 60 dBu contour. As a result, RAFTT proposes that an AM be allowed to make use of as many FM translators as necessary to overlay

the AM's daytime 2 mV/m contour with the 60 dBu contour of its FM translators so long as the 70 dBu contour of any one of the translators not intersect the 70 dBu contour of another translator being used by the same AM station. The number of translators required to provide such coverage will vary depending upon the AM 2 mV/m contour. And, of course, the number of available FM translator frequencies will vary as well. Nevertheless, RAFTT proposes the above as the maximum number of translators available to a single AM station.

Allow Daytime Only AM's To Operate 6:00 AM – 6:00 PM LOCAL

There is one change in the rules that for the more than 500 remaining "True" Daytime Only ("Daytimer") stations (defined stations with no pre-sunrise or post sunset authority) would provide an immediate upgrade and that is a change allowing all Daytimers to keep a minimum on air schedule of not less than 6:00 AM till 6:00 PM local time. The inability to keep such a schedule for even part of each year is the severest limit faced by any AM station. Even after the advent of Post Sunset Authority which was granted to many previous Daytimers, there remains a considerable number (into the hundreds) of AM stations which cannot provide service in either early morning or late afternoon hours (so-called Drive Times) because of a lack of pre-sunrise or post sunset authority. There are many well established technical reasons for not allowing all AM stations to operate during all nighttime hours; however, a change in rules which would allow Daytimers to operate between the local hours of 6:00 AM and 6:00 PM throughout the year would go a long way in providing Daytimers the opportunity to serve the communities within their coverage areas without major disturbance to local service of the stations Daytimers are required to protect at night.

For Daytimers, periods between 6:00 AM and licensed Sign-On are crucial times (sometimes only a quarter of an hour) when audiences which would otherwise tune into the Daytimer for local news and information. Instead, those listeners are forced to go elsewhere because their local Daytime only AM

station is forced to remain silent, often to protect a signal many hundreds of miles distant from the local market. Once gone, this audience cannot easily be prodded back. As an example, explaining that your AM station operating on 1060 kHz in Lockhart, Texas can't be on the air to provide the local school lunch menu and other local information because it is off the air to protect dominant stations in Philadelphia or Los Angeles or Chicago makes little sense to most local licensees let alone potential local listeners who can only hear static instead of local information or local advertisers who wonder why they can't reach local listeners during these crucial time periods.

The same is true for evening hours up until 6:00 PM local. Once again, important local news and information which help Daytimers be an essential part of their local communities is for much of the year, completely lost and with it, the station's natural audience, not because the station isn't on until midnight, but because it isn't on the air at all while potential local listeners are driving home from work. Daytime only AM's are forced to compete with the equivalent of both their hands tied behind their backs. Since schedules literally track the rising and setting of the sun, the shortest days fall in the winter months of November, December and January. Northern Daytimers are penalized the worst but no Daytimer is immune to ridiculously short broadcast schedules during these months. Daytimers in the southern latitudes such as RAFTT's KULF in south Texas are forced to operate from 7:15 AM to 5:30 PM (See: Exhibit 5) on their shortest scheduled months while Daytimers in the northern latitudes such as KQLX (FCC ID: 48653) in Lisbon, North Dakota are limited to an astonishing 8:15 AM till 4:45 PM schedule (See: Exhibit 6). For the uninitiated, such hobbles would appear unbelievable; however, in 2014 there are hundreds of Class D AM's which each year face this same fate. How do you compete when you aren't there? If a more limiting circumstance exists to keep an AM station from competing favorably with other media, it escapes the view of this commenter.

There is the argument that FM translators can fill this void. Not all Daytimers will qualify for a translator and some that do will find the road to translator implementation a long one.. Each Daytimer can benefit from this proposal…right now……immediately. Technical considerations withstanding, this is a change that should take place now.

Though anecdotal, RAFTT submits that for the vast majority of Daytimers, the least among all AM stations, the single greatest "revitalization" improvement for Daytime Only AM stations in the United States would be to allow each of them to remain on the air for not less than 6:00 AM until 6:00 PM local time throughout the year including periods of Daylight Savings Time. This action would cost the Daytimers nothing. It would have little no impact on the groundwave signals of protected stations.

In light of these circumstances, RAFTT proposes the Commission allow the remaining true Daytimers, those stations with no Pre-Sunrise or Post-Sunset authority, to operate year round with either their licensed Daytime or Critical Hours facilities from at least 6:00 AM until 6:00 PM local time.

Open Expanded Band Frequencies 1610 kHz – 1700 kHz To More Use and Allow 530 kHz Stations

While there are Daytimers suffering highly restrictive schedules, there is also a significant portion of AM spectrum underutilized for no good reason. RAFTT proposes to make additional use of the so-called AM Expanded Band ("EB") frequencies between 1610 kHz and 1700 kHz as well as the low medium wave frequency 530 kHz. As conceived in the 1970's and 80's, the EB frequencies were to have been used to eliminate some of the AM clutter that had beset the band in the 50's and 60's. That purpose was completely abandoned when the medium wave channels originally scheduled for decommissioning were allowed to remain on the air at the end of the five year implementation of the EB frequencies.

Unfortunately, all that was accomplished in the multi-year, lawsuit driven process was the creation of an under populated extension of the medium wave band that eliminated fewer than a dozen older medium wave stations while creating an under utilized 10 channel adjunct wherein use of the EB channels has been highly restricted, the vast majority of the nation has nothing it can hear on that end of the band. The result is there is little or no reason for all but a tiny group of potential listeners to tune above 1600 kHz on their AM dials. The Public Interest has not been served well as a result.

RAFTT proposes an opening up of these EB channels as well as the single frequency 530 kHz to be limited for use to revitalize true Daytimer Class D and Class C AM's. RAFTT proposes that the current Daytime standard protections detailed in Section 73.37 of the Rules be instituted for the proposed opening of these EB channels with a Daytime power limit of 10 kW Non-Directional. RAFTT proposes currently licensed EB Nighttime signals be protected under the same requirements as Class B stations now with a night power limit of 1 kW and a directional antenna null limit of not less than 141 mV/m/km, thus giving ample protection to current signals and not encouraging dramatic directional patterns.

The original objective of opening the Expanded Band was abandoned when those permitees who were awarded Expanded Band CP's/licenses where successful in lobbying to have the most significant "reason" for their receiving those permits in the first place, namely; the forfeiture if their lower band frequencies five years after grant of the CP for the Expanded Band channels. The licensees who surrendered their old medium wave frequencies upon grant of the Expanded Band frequencies may have been the most aggrieved in the entire process but to say the least, those Expanded Band frequency can now make little claim to the vast tracts of unused spectrum atop which they sit. The words underutilized and medium wave spectrum for the nearly perfect oxymoron for the majority of the AM band but not in the Expanded Band. The Commission should move with all haste to develop filing criteria as outlined

above and open a filing window to true Daytimer Class D and Class C stations to make use of this end of the AM band.

RAFTT proposes that any Class D or Class C stations granted a move to 530 kHz or to an EB channel be required to forfeit the license for their medium wave station within six (6 months) of commissioning their EB or 520 kHz facility. This would ensure the arguments which led to the Relicensing of medium wave frequencies during the last EB episode

Conclusions

RAFTT believes it has proposed five sensible, rational changes which will give immediate and meaningful substance to the instant AM revitalization rulemaking. The logic of its first proposal, that of removing the artificial and arbitrary 25 mile limit to FM translator 60 dBu contours, is self-evident. As the cited examples clearly demonstrate, the rule serves no purpose for stations in poor conductivity and only acts as an artificial and needless barrier to those in good conductivity.

RAFTT's second proposal to make the so-called Mattoon Waiver a permanent fixture of the AM/FM Translator process. It is a crowded marketplace and given the other limiting aspects of finding an available translator, there needs to be in place a mechanism allowing for relocation a translator site such that the translator can be an asset to the AM while also placing a reasonable limit on the distance the translator can be moved and remain a minor change. The three criteria proposed by RAFTT in this regard have all been used in determining qualification for a Mattoon Waiver. They are well reasoned. Their codification as part of this rulemaking would allow AM licensees to have one more constant to rely upon as they attempt to make improvements to their AM operations through the acquisition of FM translators.

RAFTT's third proposal regarding limits on the number of translators available to any one AM also serves the purpose of placing a constant to what has now been a variable number. A common sense relationship between the 2 mV/m Daytime contour of the AM station and the 60 dBu contour of the

translator should serve as the template when considering any technical relationship between the two operations. In many cases, marketplace availability of translator sites, allocation considerations, higher interfering signals impeding the translator's interference free signal, etc., will render the use of a single translator only a partial and incomplete solution to coverage issues. The situation may require as many as three or even four translators in order to replicate on the FM band the area covered by the 2 mV/m Daytime coverage of the AM. A reasonable separation between such co-owned translators is applicable. RAFTT proposes the separation of the 70 dBu contour of two translators as being appropriate for this purpose.

RAFTT submits what it believes to be the most important improvement for the least among AM siblings, the allowance for true Daytimers to keep minimum schedules of 6:00 AM till 6:00 PM local time. No other change in the rules would have such an important and immediate impact on the remaining true Daytimers in the United States as this one change.

Finally, RAFTT proposes the Commission set about fully populating the Expanded Band frequencies between 1610 kHz and 1700 kHz and the lowest medium wave frequency 530 kHz and that these frequencies be set aside for use by true Class D Daytimers and the six Class C channels. The Expanded Band frequencies are currently under populated while the remainder of the band is crammed cheek by jowl. It is ridiculous to leave fewer than 90 stations to populate these 11 channels while forcing Daytimers to sign on during winter months as late as 8:15 AM and to leave the air as early as 4:45 PM.

Respectfully submitted,

Jerome Friemel, President
The RAFTT Corporation
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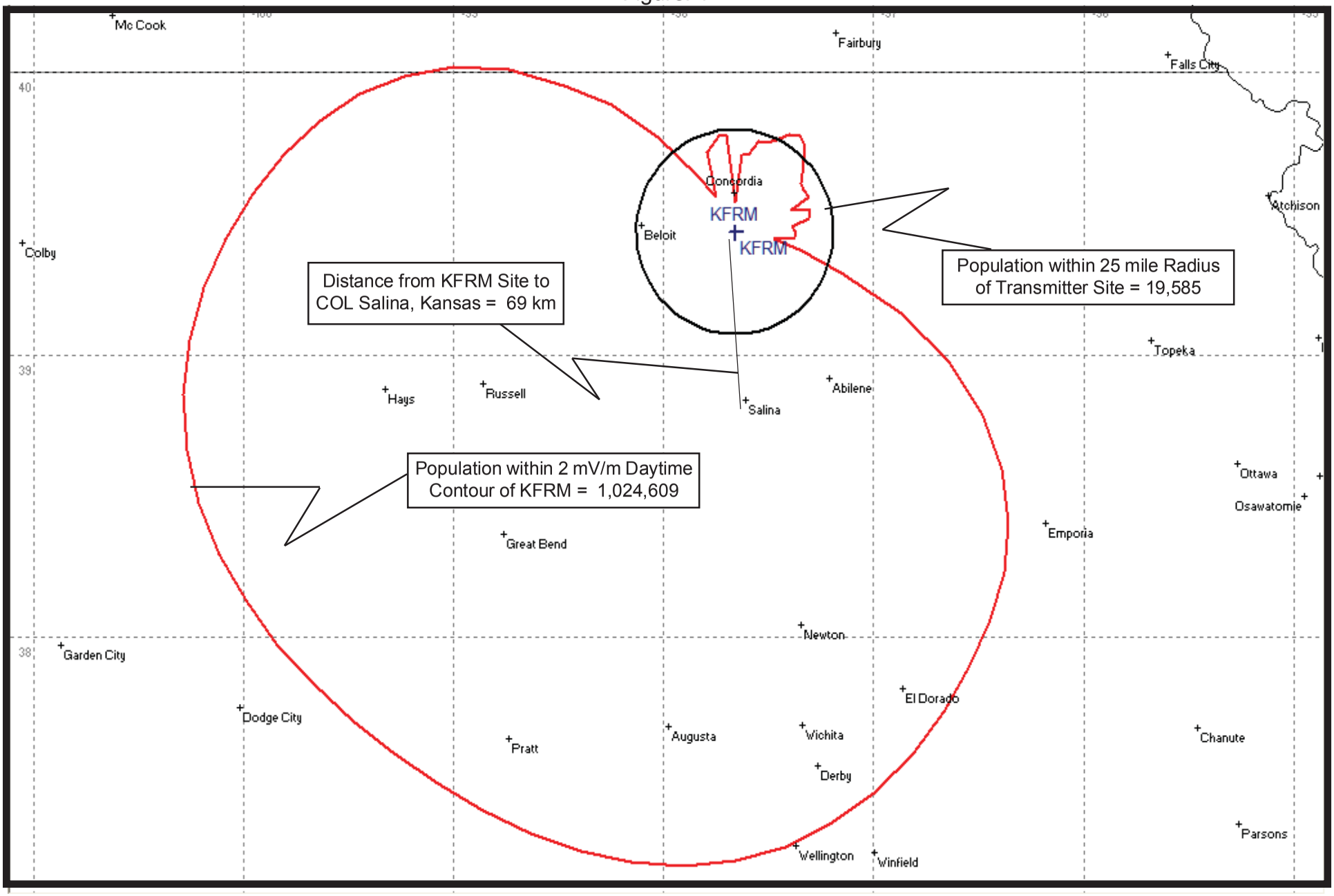
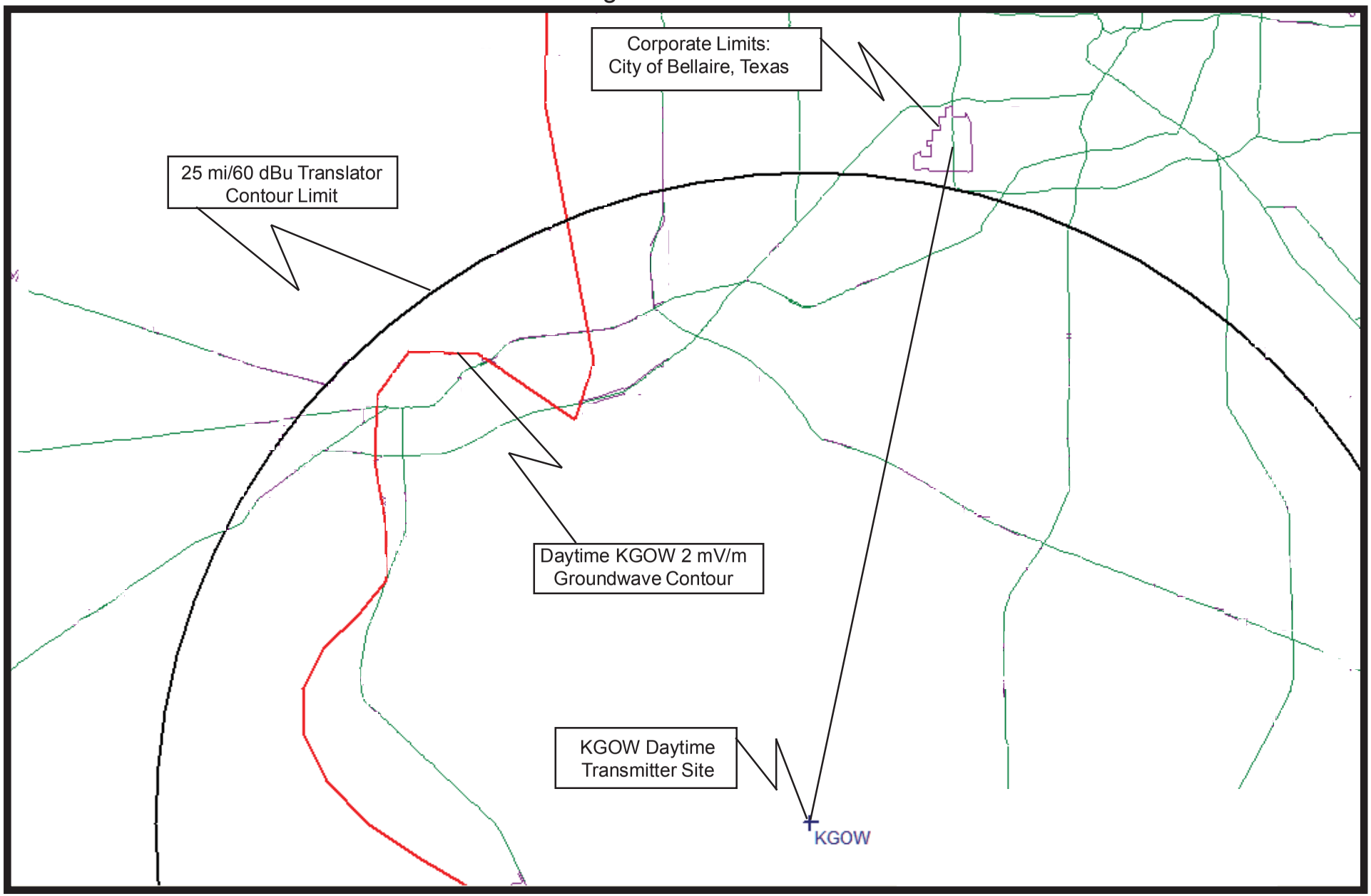
Houston, Texas 77099
(281) 564-7064
raftt@sbcglobal.net

Map Indicating KFRM 2 mV/m Daytime Contour (red) Versus
25 mile Distance from KFRM Transmitter Site (black) and
Distance to Community of License, Salina, Kansas

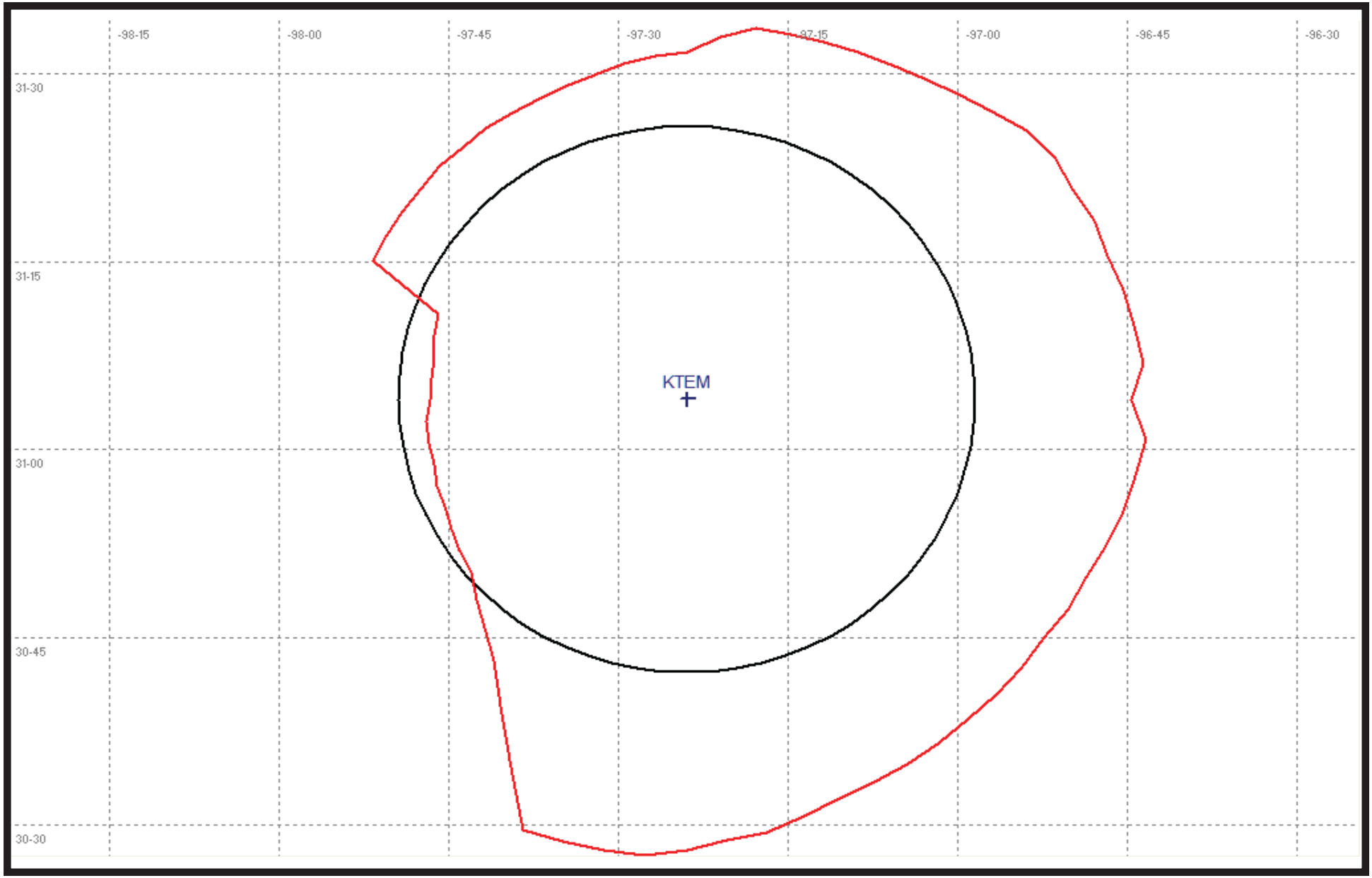
Figure: 1



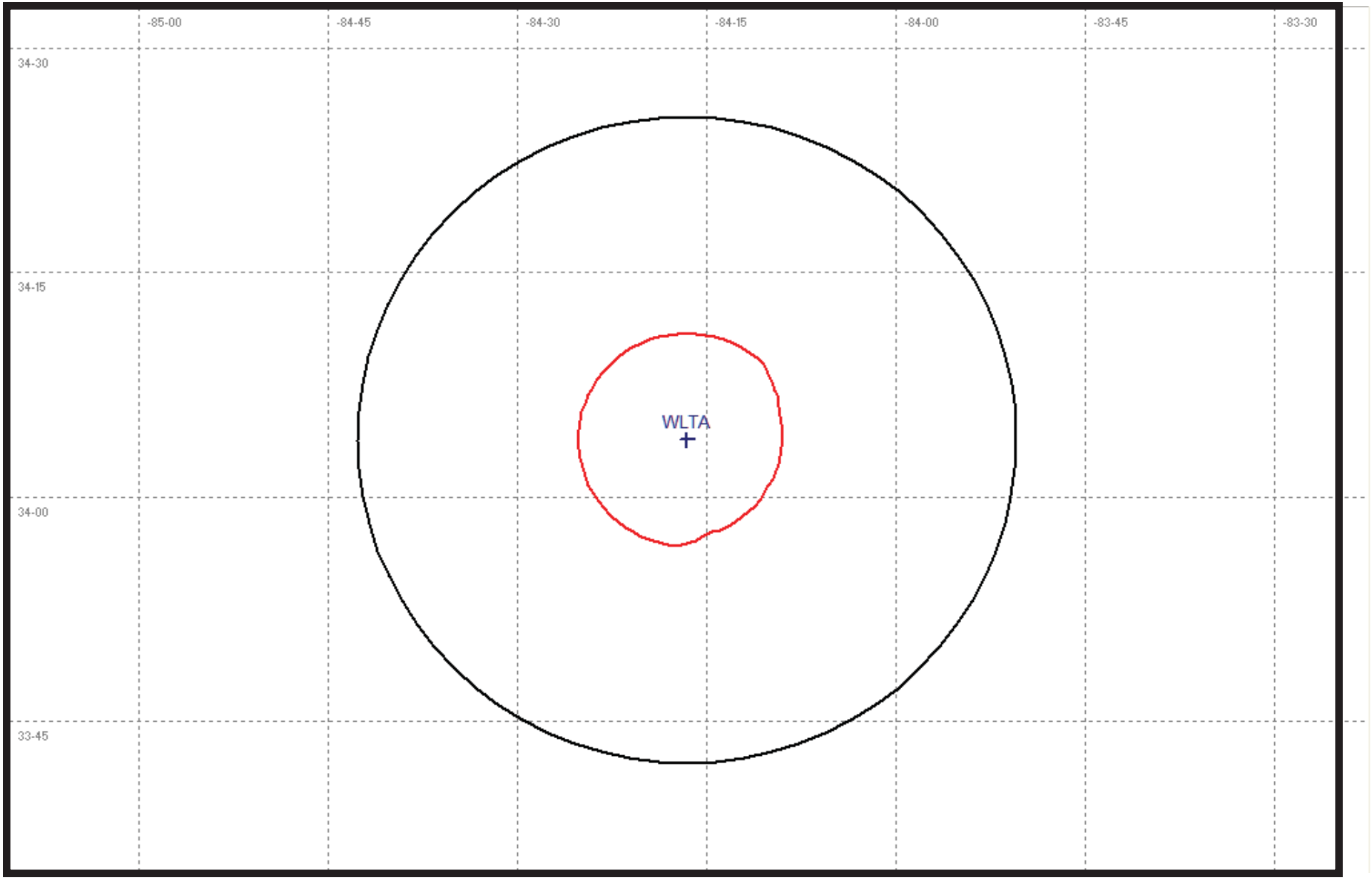
Map Indicating KGOW 2 mV/m Daytime Contour (red) Versus
25 mile Distance from KGOW Daytime Transmitter Site (black) and
Distance to Community of License, Bellaire, Texas
Figure: 2



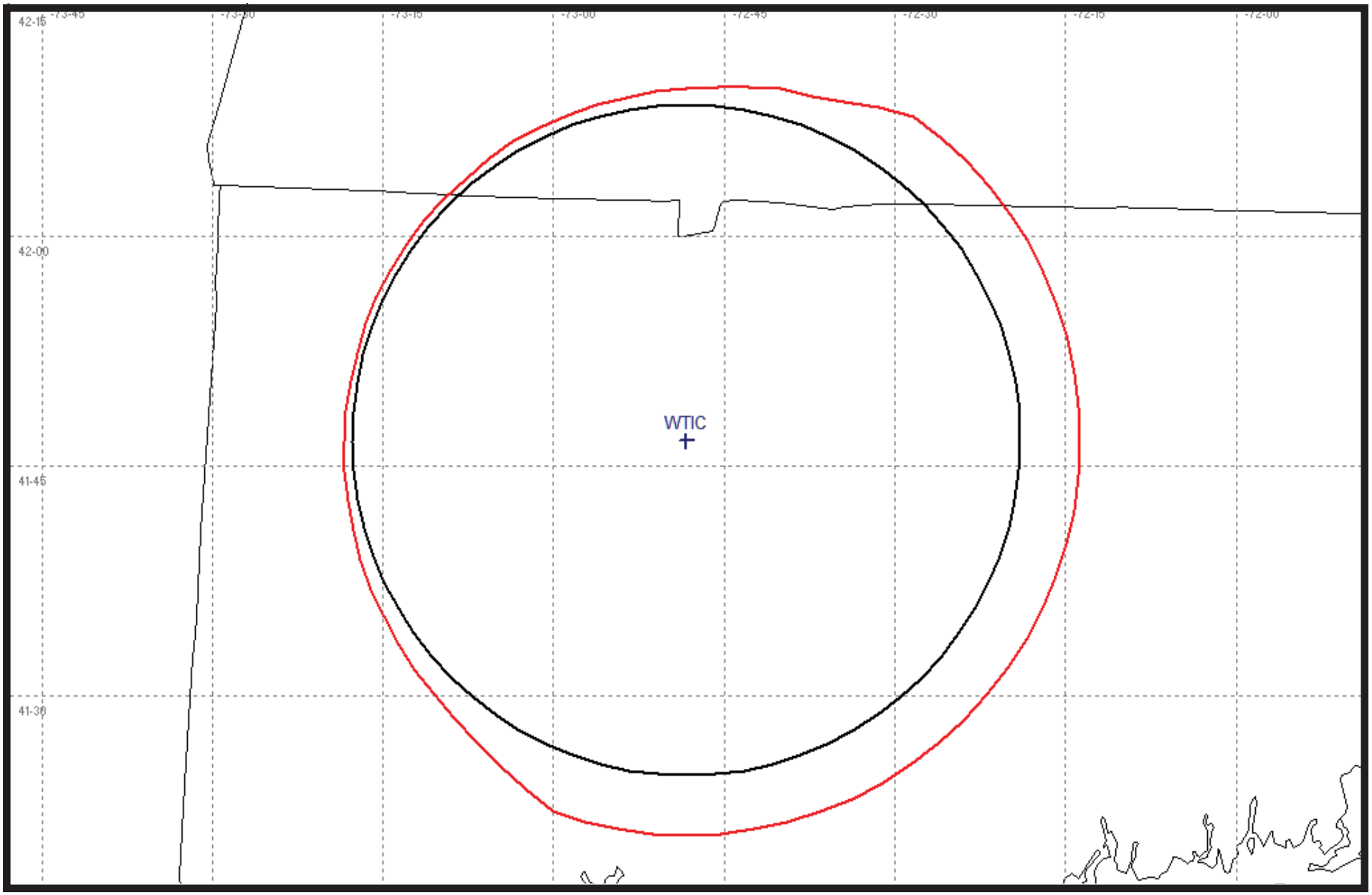
Map Indicating KTEM 2 mV/m Daytime Contour (red) Versus
25 mile Distance from KTEM Transmitter Site (black)
Figure: 3



Map Indicating WLTA 2 mV/m Daytime Contour (red) Versus
25 mile Distance from WLTA Transmitter Site (black)
Figure: 4



Map Indicating WTIC 2 mV/m Daytime Contour (red) Versus
25 mile Distance from WTIC Transmitter Site (black)
Figure: 5



KULF AM 1090 kHz, 1.0 kW, DA-D
Sign On - Sign Off Schedule
Figure: 6

United States of America

FEDERAL COMMUNICATIONS COMMISSION
AM BROADCAST STATION LICENSE

Authorizing Official:

Son Nguyen
Supervisory Engineer
Audio Division
Media Bureau

Grant Date: March 21, 2011

This license expires 3:00 a.m. local time, August 01, 2013.

Official Mailing Address:

JLF COMMUNICATIONS, LLC
10614 ROCKLEY ROAD
HOUSTON TX 77099

Facility Id: 48653

Call Sign: KULF

License File Number: BL-20101019ADB

This license covers permit no.: BP-20091207ACW

Subject to the provisions of the Communications Act of 1934, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this license, the licensee is hereby authorized to use and operate the radio transmitting apparatus herein described.

This license is issued on the licensee's representation that the statements contained in licensee's application are true and that the undertakings therein contained so far as they are consistent herewith, will be carried out in good faith. The licensee shall, during the term of this license, render such broadcasting service as will serve the public interest, convenience, or necessity to the full extent of the privileges herein conferred.

This license shall not vest in the licensee any right to operate the station nor any right in the use of the frequency designated in the license beyond the term hereof, nor in any other manner than authorized herein. Neither the license nor the right granted hereunder shall be assigned or otherwise transferred in violation of the Communications Act of 1934. This license is subject to the right of use or control by the Government of the United States conferred by Section 606 of the Communications Act of 1934.

Hours of Operation: Daytime

Average hours of sunrise and sunset:
Local Standard Time (Non-Advanced)

Jan.	7:15 AM	5:45 PM	Jul.	5:30 AM	7:30 PM
Feb.	7:00 AM	6:15 PM	Aug.	5:45 AM	7:00 PM
Mar.	6:30 AM	6:30 PM	Sep.	6:15 AM	6:30 PM
Apr.	6:00 AM	6:45 PM	Oct.	6:30 AM	6:00 PM
May	5:30 AM	7:15 PM	Nov.	6:45 AM	5:30 PM
Jun.	5:30 AM	7:30 PM	Dec.	7:15 AM	5:30 PM

KQLX AM 890 kHz, 1.8 kW, ND-D
Sign On - Sign Off Schedule
Figure 7

United States of America

FEDERAL COMMUNICATIONS COMMISSION
AM BROADCAST STATION LICENSE

Authorizing Official:

Official Mailing Address:

GREAT PLAINS INTEGRATED MARKETING, INC.
64 BROADWAY
FARGO ND 58102

Penelope A. Dade
Supervisory Analyst
Audio Division
Media Bureau

Grant Date: October 27, 2005

This license expires 3:00 a.m. local time, April 01, 2013.

Facility Id: 60189

Call Sign: KQLX

License File Number: BL-20050801DSA

This License Covers Permit No.: BP-20041115AEU

Subject to the provisions of the Communications Act of 1934, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this license, the licensee is hereby authorized to use and operate the radio transmitting apparatus herein described.

This license is issued on the licensee's representation that the statements contained in licensee's application are true and that the undertakings therein contained so far as they are consistent herewith, will be carried out in good faith. The licensee shall, during the term of this license, render such broadcasting service as will serve the public interest, convenience, or necessity to the full extent of the privileges herein conferred.

This license shall not vest in the licensee any right to operate the station nor any right in the use of the frequency designated in the license beyond the term hereof, nor in any other manner than authorized herein. Neither the license nor the right granted hereunder shall be assigned or otherwise transferred in violation of the Communications Act of 1934. This license is subject to the right of use or control by the Government of the United States conferred by Section 606 of the Communications Act of 1934.

Hours of Operation: Daytime

Average hours of sunrise and sunset:
Local Standard Time (Non-Advanced)

Jan.	8:15 AM	5:15 PM	Jul.	4:45 AM	8:15 PM
Feb.	7:30 AM	6:00 PM	Aug.	5:30 AM	7:45 PM
Mar.	6:45 AM	6:30 PM	Sep.	6:00 AM	6:45 PM
Apr.	5:45 AM	7:15 PM	Oct.	6:45 AM	5:45 PM
May	5:00 AM	8:00 PM	Nov.	7:30 AM	5:00 PM
Jun.	4:30 AM	8:30 PM	Dec.	8:00 AM	4:45 PM