

Summit Media Broadcasting, LLC  
Summit Media Inc.  
180 Main Street  
Sutton, WV 26601

January 14, 2014

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Washington, DC 20554

Comments for MB Docket No 13.249 Revitalization of the AM Radio Service

Summit Media Broadcasting, LLC is the licensee of WSGB 1490 AM Sutton, WV on the air since 1964 and Summit Media Inc. is the licensee of WVAR 600 AM Richwood, WV on the air since 1957. Both AM stations are located in rural central West Virginia and have very limited coverage area. Summit Media during the past decade has upgraded both stations with new equipment and has done all it can to make these stations viable. However during the past decade the noise level on the AM band has rendered both station difficult to listen to unless you are within a couple of miles from the tower sites, night coverage is even worse. Summit Media has continued to keep both of these AM stations on the air operating at a loss so that it can continue to provide more programming variety for our rural communities.

Both Summit Media Broadcasting, LLC and Summit Media Inc. encourages the FCC to help revitalize AM stations with a variety of solutions, our preferred method would be to use the channel 5 or 6 TV spectrum to create a new service and move all AM licensees to a newly created band, the same band would also have room to move all LPFM stations (current and future ones) to this new band. The AM operators would be happy to have a permanent solution, the LPFM operators would have plenty of channels to use and even present FM licensees would love to be free of interference from LPFM stations springing up causing new interference problems on the FM band all across the nation. Present AM licensees would be permitted to operate on both the AM band and the new channel 5 or 6 frequencies and then close down the AM signal at a given date to cease the AM operation.

Summit Media also proposes that a present AM operator in rural America that has an open Class A FM frequency in the same city of license as the AM station, would be permitted to turn in their AM channel in exchange for an open Class A FM frequency that it finds without having to go through an auction, just a plain trade-in of the AM license for the FM license. The AM channel would have to be turned off within six months of beginning the operation of the FM channel for that community. The shutting down of AM channels across the country would provide operators who do remain on the AM band the possibility of upgrades for their AM channel both for day and night operation. Summit Media would like the FCC to provide grandfathered status to any AM operator who can migrate to a Class A FM channel in the same community of license as the surrendered AM channel when considering ownership levels. Summit Media's Class B FM stations have been supporting the upkeep of our AM channels, we would like the opportunity to finally get relief and be able to move small Class C & D AM stations to a Class A FM channel in the SAME community of license.

While Summit Media supports the two above solutions as the best choices for AM relief, we also do support AM stations to be able to apply for 250 watt FM translators, however we also request that a small Class C or D AM station should be able to use a full 250 watt FM translator, for in many cases the 2 mv contour on these small 1 kw AM channels is so small that it can be reached with 100 watts. Providing these small AM stations the ability to use a full 250 watt FM translator if available, without any limitations to stay in the 2 mv contour of the AM signal would be a great solution to providing service to rural communities.

Summit Media has considered various times in the last 5 years of turning off our AM stations to save money, as others have done in West Virginia. It's time for the FCC to step up now before the AM band is totally dead. While some AM stations in the top metro areas of the United States are doing well with strong billing, these AM stations also have huge signals and large populations they can draw from for support. In rural America, that is not the case. Small AM stations here are dropping off the air or are about to close down soon unless the FCC steps up to help. In the last few years in the Central WV area, WWRL AM in Rainelle, WV went dark as well as 1400 AM (used to be WOBG-AM) Clarksburg, WV is also gone. There are other Class C & D AM stations ready to call it quits. The FCC's own licensed AM station totals have been dropping year after year, that should be plenty of proof for you.

In summary, Summit Media Broadcasting, LLC and Summit Media Inc. urges the FCC to please implement any or all of the above 3 suggestions. If our first suggestion takes too much time to implement, then permit our other two suggestions in the mean time so that AM operators get some relief now before it's too late and we have to close them down.

Thank you,

N. Al Sergi – President / Summit Media Inc.

- Managing Member / Summit Media Broadcasting, LLC.