



serves to increase intra-service interference leading to further AM degradation. We still support these efforts, but they fall far short of what is necessary to save the licensees providing service to their communities on the AM band. Countries like Canada and Brazil are clearly focused on FM migration. The FCC's efforts to find translators for AMs are tacit admission of the need for this service. Unfortunately, there is not enough spectrum in our market for our AM station to benefit from this opportunity.

We urge the Commission to support FM migration. We also suggest one additional alternative to bolster interest in the AM band: remove all foreign ownership restrictions on the AM band. It is clear the overwhelming majority of listening according to Nielson takes place on the FM band. Eliminating ownership restrictions on the AM band may actually serve to enable distressed AM owners to realize a once-in-a-lifetime opportunity to resurrect their investments and bring new owners willing to invest in the band.

Respectfully submitted  
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