

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, DC

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

TO: Honorable Marlene H. Dortch  
Secretary of the Commission

Accepted/Files

JAN 14 2014

ATTN: Peter H. Doyle  
Chief, Audio Services Division, Media Bureau

Federal Communications Commission  
Office of the Secretary

COMMENTS OF THE BERKSHIRE BROADCASTING CORPORATION

The Berkshire Broadcasting Corporation ("Berkshire Broadcasting"), licensee of AM broadcast stations WLAD, 800 kHz, Danbury, Connecticut (Facility ID 65456) and WAXB, 850 kHz, Ridgefield, Connecticut (Facility ID 66327), both stations in the Nielsen Audio defined market, hereby submits comments with respect to the above-captioned Notice of Proposed Rulemaking (FCC 13-139), released on October 31, 2013 ("NPRM") and published in the Federal Register on November 20, 2013. In support thereof, the following is set forth.

WLAD programs a news/talk format and is the market's ONLY remaining local radio news operation, employing two full-time and one part-time news staffers (WLAD further employs two additional full-time and three part-time employees for its non-news programming). Because WLAD is on a Mexican clear channel frequency (800 kHz), it is required to significantly reduce power at night, Not only is WLAD unable to cover its ENTIRE metro sunset to sunrise, the signal begins suffering interference and degradation even within our city of license. An FM translator grant for WLAD would enable us to provide reliable 24/7

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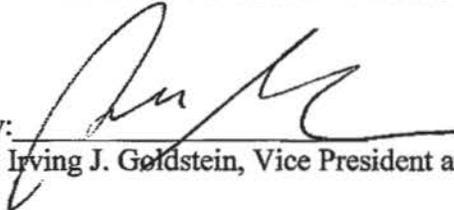
transmission – and even more importantly, wider service to the market in the event of a nighttime emergency. Moreover, if listening to the AM band continues to erode, it ultimately may not be viable for WLAD to maintain its current news/information commitment which would certainly be a lost voice for the Danbury marketplace.

WAXB is a daytime only facility. Accordingly, there is no practicable ability for this class of AM station to provide meaningful coverage to its local community, especially in the wintertime when the station is at full power for just 9 hours and 15 minutes daily.

Therefore, Berkshire Broadcasting strongly supports the NPRM's proposal to open a filing window for the sole and limited purpose of allowing existing AM stations to receive authorizations for a new FM translator (one FM translator per AM station for the sole purpose of rebroadcasting the AM station within the lesser of the 2 mV/m daytime contour of the AM station being rebroadcast and a 25 mile radius from the AM transmission site). Such proposal would greatly benefit the AM service and, by enhancing diversity, localism and competition in the AM service, would greatly improve the ability of Berkshire Broadcasting to serve the Danbury radio market and to operate its AM stations in the public interest.

Respectfully submitted

**THE BERKSHIRE BROADCASTING CORPORATION**

By: 

Irving J. Goldstein, Vice President and CEO

January 14, 2014