

“mom and pop” operators. The simple fact is a cleaner FM signal will not only serve the public interest but it can help with the financial bottom line of those small operators by providing improved service to advertisers.

3. The Commission indicates in the *NPRM* that with the opening of the window there would be a limit of one translator application per AM station. The Commission also proposes that any translator granted as a result of the new window be permanently tied to the AM station. WBS supports these minor limitations suggested by the Commission.

4. While WBS fully agrees with the translator window and the minor limitations, the Commission has also proposed to eliminate the Mattoon waivers. Mattoon waivers had been allowed for the past few years as a tool for broadcasters to move FM translator stations without the need of multiple “hops”. The theory of the Commission for the elimination of the Mattoon waiver is that such waivers would no longer be necessary because of the AM translator filing window. WBS believes the elimination of the Mattoon waiver is a mistake. The Mattoon waiver provides the ability for an AM operator to move-in a translator for use with AM facilities outside the filing window.

5. In the *NRPM*, the Commission has requested other ideas which might help the AM service. Since FM translators will have the greatest impact on AM stations, WBS believes the Commission should consider modifying its current AM-FM Translator rule. Today, an FM translator which is being paired with an AM station must be located within the 2 mV/m contour of the AM station or 25 miles, whichever is less. WBS proposes that the Commission drop the 25 mile limit and allow for the translator to be

placed anywhere within the 2 mV/m contour of the AM station, so long as the translator does not extend beyond the 2 mV/m counter of the AM station. This change would simply give more flexibility to AM operators to locate translators within their coverage area.

WHEREFORE, the forgoing premises considered, WBS respectfully submits these instant Comments.

Respectfully submitted,

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