

Before The
Federal Communications Commission
Washington, D.C.

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

**COMMENTS
OF
FOOTHILLS BROADCASTING, INC.**

Foothills Broadcasting, Inc., (“Foothills”), by its attorney, pursuant to *Notice of Proposed Rule Making (“NPRM”) FCC 13-139 (released October 31, 2013)*, hereby submits these Comments in the above-captioned rule making proceeding regarding the proposal of the Commission for the revitalization of the AM Radio Service. In support hereof, Foothills submits the following:

1. Foothills is the Licensee of Radio Station WOAY (AM), Oak Hill, West Virginia. Foothills is thankful that the Federal Communications Commission (“Commission”) has undertaken this Rule Making process which is sought to revitalize the long suffering AM band.

2. Of the proposals¹, Foothills feels the greatest positive impact will come from an opening of an FM Translator filing window exclusively for AM licensees and permittees. Having the ability to obtain a translator can be a game changer for many AM “mom and pop” operators. The simple fact is a cleaner FM signal will not only serve the

¹ Please note that Foothills also fully supports the technical improvements to the AM band, including the elimination of the Ratchet Rule, coverage obligations, new efficiency standard and use of MDCL technologies.

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. Foothills supports these minor limitations suggested by the Commission.

4. While Foothills 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. Foothills 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, Foothills 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.

Foothills 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, Foothills respectfully submits these instant Comments.

Respectfully submitted,

FOOTHILLS BROADCASTING, INC.



By: _____

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