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I am the licensee of a Class D AM directional radio station for over 25 years now. My comments on AM Revitalization follow: First, I applaud the FCC for focusing on this matter because we are dying a slow death due ONLY to technical issues. The most profound change that can be made is the abandonment of the AM efficiency standards for AM towers. We are forced to paint, light, and maintain a full-time 3-tower array for a 500-watt small town AM radio station. It is not affordable going forward. If we could use the available technology like the Valcom free-standing Whip-Antenna at less than 1/4 wavelength, we would save thousands of maintenance dollars per year -and- have a tremendous amount of location flexibility. We can compete in every other way on-air so please, please, please give this part of the rules a close consideration. Thank you.