

**Before the
Federal Communications Commission
Washington, D.C.**

In the matter of:

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Revitalization of the AM Radio Service) MB Docket No. 13-249

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COMMENTS OF TZ SAWYER TECHNICAL CONSULTANTS, LLC

The engineering technical consulting firm of TZ Sawyer Technical Consultants (“TZSTC”) hereby submits these comments in response to the Commission’s October 31, 2013 Notice of Proposed Rulemaking in the above-captioned proceeding.

In that Notice, the Commission solicited comments on its various specific proposals and also invited submission of further proposals. We have reviewed the Notice and strongly support the Commission’s goal of revitalizing the AM radio service.

With more than 40 years of industry service to the licensees of AM radio stations, and 29 years in matters directly before the Commission we respectfully submit our comments.

FCC Section A. An AM only FM Translator Filing Window

With great reluctance we support the opening of a filing window for new FM translator stations restricted to current licensed and construction permit holders in the AM broadcast service, provided that certain anti-trafficking procedures are in place.

The filing window should be crafted as to allow only for the establishment of FM translators that are bound exclusively to the AM parent/primary station.

The creation of a new FM translator station to serve an AM station utilizes an ever decreasing spectrum resource within the FM broadcast band and as such should be bound, tied and linked with the underlying AM parent station (primary) until surrendered by the primary station or cancelled by some other Commission action.

Adopting of this restriction will hopefully ensure that the resource is probably utilized as an aid to the primary AM station and not as a means to speculate in the trading, swapping, reselling, or other re-purposing efforts. Nor, should the translator become a means for the AM Licensee to become a “backdoor” FM broadcaster at some future date.

Revocation or cancellation of the primary station permit should result in the termination of the translator permit which is secondary to the primary station permit.

However, we urge the Commission to consider a more even handed approach by awarding a priority to AM stations in a general filing window open to the public instead of an exclusive AM only window.

To resolve MX applications amongst AM applicants, a further priority using a point system could be developed based on public benefit.

Our support of an “AM Only” window is dampened by the knowledge that such treatment creates a special consideration to a relative small number of AM stations, and does nothing to improve AM reception by the public - which is the heart of the matter.

We also urge the Commission to allow the movement of existing translators without regard to their present licensed location for use with AM facilities.

If the translator “works” at the new location, then the end result is “no harm, no foul.” Spectrum usage remains neutral. Existing FM translators moved in such a manner should be forever linked to the AM station to prevent abuse of this move-in procedure.

FCC Section B. Modify Daytime coverage standards for AM stations for licensed stations who will remain in the same community of license to allow coverage of either 50% of the area or 50% of the population within the community boundary.

We fully support the reduction in this requirement to the 50% level for existing stations, but believe that it does not go far enough and believe it should be extended to all stations (AM and FM), including new AM stations and FM allotments.

Simply put, how does one justify or claim a public benefit in one service and not include the other?

Creating a separate class of grandfather facilities versus any future new entrants is problematic at best and presents an unfair advantage to existing facilities, and at worst is a discriminatory practice against new station owners that has no public benefit other than to preclude and deprive them of market flexibility granted to others.

Section C. The FCC proposes to eliminate nighttime coverage requirements for existing licensed stations and to allow licensed stations changing community of license to cover 50% of the area or population with a 5.0 mV/m night contour or the NIF contour whichever is higher.

We support the elimination of the nighttime coverage requirements for ALL AM stations, including existing, proposed (new) or changing community of license applicants or licensees.

As long as the daytime community service requirement is met (at whatever level is adopted) the facility is tied to its community or proposed community.

A higher standard is not required simply because a station seeks to serve a different community. Writing “double” or obscure standards of service is never wise of a regulatory agency.

The level of service to a community at night should be left as a business decision made by the permittee, just as the minimum operating hours rules allow for reduced nighttime operating hours as a business decision, the move to a reduced or no nighttime service standard is not that far of a leap, nor is the public harmed given the numerous alternatives.

To paraphrase, “If you build it he will come” to “if they listen we will serve” both are market driven business decisions.

Section D. Remove the Nighttime Ratchet Rule

The provision of the nighttime “ratchet rule” has not yielded the result desired and in fact has been counterproductive when existing stations have had to reduce service areas as a result of site relocation or other antenna changes.

Section E. Modulation Dependent Carrier level Control

Adoption of MDCL should be allowed without restriction. Stations using this technology should carry a notation in the FCC CDBS system and on their station license. Some regulatory procedures need to be established to allow for field intensity measurements to be taken on MDCL stations by notice to the licensee and

mutual arrangement.

Section F. Modification of AM Antenna Efficiency Standards

Minimum radiation efficiency should be eliminated for all stations, stations proposing operation utilizing radiation values less than the current standards as derived by Figure 8 of the Commission rules should be required to measure the radiation value (via field intensity measurements) and the measured/adopted value be so noted on the station license and in the FCC CDBS system.

Section G. Other Areas/Comments

Expanded AM Band, A Spectrum Waste

References to the expanded AM band should be deleted. The expanded AM band is a failure because it is under utilized and is an example of a regulatory agency that lost track of the original goals for this spectrum.

The expanded band should be rolled into the same allocation standards that are in use in the “Standard” AM band and opened to all applicants with a preference given to NEW broadcast entrants and a secondary preference given to existing licensees moving from the standard band.

All existing licensees that still hold a parent/paired permit in the Standard band with an expanded band permit must select which facility (permit) it wishes to move forward with and turn-in the other for cancellation. These were the terms upon

which the original expanded band permits were issued.

It's time to enforce the those conditions and move forward with repopulating of the spectrum with new broadcast entrants.

Allocation Standards Class A, B, D and C Stations - Daytime

Reduce the daytime protected contour to 1 mV/m groundwave.

Protection of groundwave contours to levels below the AM noise floor is not in the public interest, serves no purpose as protection below the noise floor is already masked, and restricts others from making improvements due to over-protection of facilities.

Much like a below maximum height FM station results in overprotection, an AM station protected to a signal level below the band noise floor yields the same result. Class A AM stations are an example of a highly overprotected facility in today's noisy AM environment.

The bigger question that requires further discussion; is the AM band noise floor 1mV/m, 1.5 mV/m or 2 mV/m?

Daytime 1st Adjacent Channel protection (All Classes)

Revert to the former protection ratio of 1:1 of the protected groundwave contour. The current standard serves no purpose in an environment in which receivers are narrowband.

Daytime 3rd Adjacent Channel protection (All Classes)

Elimination of the 3rd adjacent channel protection requirement would allow greater flexibility in site selection. The current restriction serves no demonstrated purpose.

Allocation Standards Nighttime Class A

Protection to the 1 mV/m groundwave contour, eliminate the nighttime skywave protected service from Class A stations as unnecessary and unrealistic in today's radio noise environment. This will allow others greater flexibility to improve their local facilities, and offer new nighttime service opportunities where currently none exist.

Allocation Standards Nighttime - All Stations, All Classes

Eliminate 1st adjacent channel nighttime protection requirements as unnecessary and burdensome.

Uniform Pre Sunrise Authorization

Providing for a uniform 500 watt daytime operation at 6 AM local time for those stations operating with a lesser power at 6 AM -- using their daytime authorized antenna system.

Stations authorised with less than 500 watts during daytime hours would use their authorized daytime power (i.e., 250, 300 watts, etc.).

The public benefit outweighs any short-term (time duration) interference issues that might arise.

Minor Change Processing Rules

Change the definition of a minor change to include a change to any frequency (standard 10 kHz channels) between 540 and 1700 kHz provided that a change in community of license is not proposed. The flexibility and the end result in public benefit are similar to that provided to FM broadcasters.

Remove the restriction on “Class C” to “Class D” Changes

Allow Class C stations to migrate to Class A or B channels as Class D if they so desire. I know of several Class C stations that could move to adjacent channels and provide better service to their communities and a much larger service area, but are restricted from doing so unless they operate as a Class B first, then change to a Class D.

AM Synchronous Transmitters

Use of AM synchronous transmitters should be authorized. Maximum deviation of carrier frequency between all units (master and slaves) should be 0.5 Hz or less.

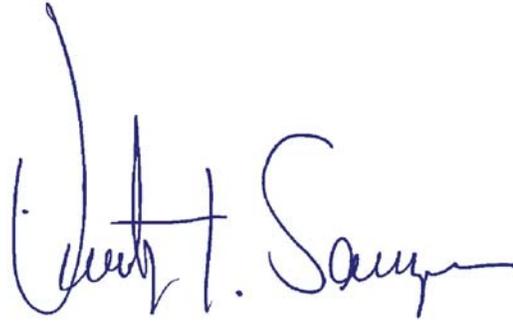
Use of AM synchronous transmitters should not be restricted as to any minimum

power standards per transmitter site and the network of such stations should be consider in total as a single-frequency-network with regards to allocation standards (similar to the DTS networks in television service).

Respectfully submitted

January 21, 2014

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A handwritten signature in blue ink, reading "Timothy Z. Sawyer". The signature is written in a cursive style with a large initial "T" and "S".

Timothy Z. Sawyer, Principal