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January 22, 2014

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: In the Matter of Revitalization of the AM Radio Service
MB Docket No. 13-249**

Dear Ms. Dortch:

This letter is being filed in the above-referenced proceeding on behalf of the fifty (50) State Broadcasters Associations named at the end of this letter (collectively, the “Associations”).

The Associations applaud the Commission’s commitment to diligently examine measures to revitalize the AM broadcast service nationwide. The Associations are particularly grateful to Commissioner Pai for his outstanding leadership in this important matter. As the Commission is aware, there are currently 15,358 full-power AM and FM broadcast stations licensed to communities throughout the country. Of that number, 4,727 or 30.78% are AM stations.¹ Given the large number of AM stations reaching listeners in every corner of the country, this proceeding represents a superb opportunity for the Commission to revitalize one of its most important broadcast services and to support the millions of residents throughout our nation that continue to rely so heavily upon the day-to-day service of AM radio broadcasters.

¹ FCC News, *Broadcast Station Totals as of December 31, 2013*, January 8, 2014, http://transition.fcc.gov/Daily_Releases/Daily_Business/2014/db0108/DOC-325039A1.pdf.

As the Commission points out in its *Notice of Proposed Rule Making* (“NPRM”), AM radio is an important source of local broadcast content such as news, sports, and other types of informational programming.² However, interference concerns, the inability to operate at night, and other factors have long posed mounting challenges to AM stations that do not plague broadcasters operating in other portions of the spectrum.³ Therefore, the Commission is correct in its determination that it is time to revitalize AM radio.

The Associations would like to call the Commission’s attention to the interconnection between AM stations and the Commission’s so very important Emergency Alert System (“EAS”). As the Broadcast Warning Working Group notes in its comments, AM broadcast service plays a vital role in the distribution of emergency alerts.⁴ This important function, standing alone, should serve as an impetus for the Commission not just to look for ways, but to find ways, to strengthen AM service. Emergency officials, including no less than the President of the United States, need a reliable way to use EAS and communicate with the public during times of natural disasters and other crises.⁵ Because the AM band is indispensable for a robust and effective EAS, revitalizing AM radio will actually enhance the safety of the American people.

Judging from the comments filed to date, the Commission is already the beneficiary of numerous, very constructive and highly technical analyses and recommendations. (The Associations have attached to this letter a summary of the comments recently filed in this proceeding in order to illustrate our point). These highly technical proposals may affect various local markets and even some states differently. Thus, rather than taking a particular position on any specific proposal, the Associations write to applaud the Commission for focusing on the importance of an improved the AM band to the American people.

Whatever course of action the Commission adopts, it should act quickly because time is of the essence in the quest to revitalize the AM broadcast service. For example, in some local markets, those AM stations that are precluded from operating at night are, obviously, most deserving of immediate assistance from the Commission because they cannot provide news and other information to their local communities

² *In the Matter of Revitalization of the AM Radio Service*, Notice of Proposed Rulemaking, FCC 13-139, MB Docket No. 13-249, ¶ 3 (October 31, 2013).

³ *Id.* at ¶¶ 4–5.

⁴ Comments of the Broadcast Warning Working Group, MB Docket No. 13-249 (January 2, 2014).

⁵ *Id.*

Indiana Broadcasters Association,
Iowa Broadcasters Association,
Kansas Association of Broadcasters,
Kentucky Broadcasters Association,
Louisiana Association of Broadcasters,
Maine Association of Broadcasters,
MD/DC/DE Broadcasters Association,
Massachusetts Broadcasters Association,
Michigan Association of Broadcasters,
Minnesota Broadcasters Association,
Mississippi Association of Broadcasters,
Missouri Broadcasters Association,
Montana Broadcasters Association,
Nebraska Broadcasters Association,
Nevada Broadcasters Association,
New Hampshire Association of
Broadcasters,
New Jersey Broadcasters Association,
New Mexico Broadcasters Association,
New York State Broadcasters
Association, Inc.,
North Carolina Association of
Broadcasters,
North Dakota Broadcasters Association,
Ohio Association of Broadcasters,
Oklahoma Association of Broadcasters,
Oregon Association of Broadcasters,
Pennsylvania Association of
Broadcasters,
Radio Broadcasters Association of
Puerto Rico,
Rhode Island Broadcasters Association,
South Carolina Broadcasters
Association,
South Dakota Broadcasters Association,
Tennessee Association of Broadcasters,
Texas Association of Broadcasters,
Utah Broadcasters Association,
Vermont Association of Broadcasters,
Virginia Association of Broadcasters,
Washington State Association of
Broadcasters,
West Virginia Broadcasters Association,
Wisconsin Broadcasters Association,
Wyoming Association of Broadcasters

**Attachment – Summary of Comments in MB Docket No. 13-249
In the Matter of Revitalization of AM Radio Service**

Filing Party	Arguments
City of Durand, Wisconsin	<ul style="list-style-type: none"> • WRDN would like to maintain its stronger signal for the entire day
The Berkshire Broadcasting Corporation	<ul style="list-style-type: none"> • Supports proposal to open FM translator filing window for AM licensees
S-R Broadcasting Company, Inc.	<ul style="list-style-type: none"> • Use VHF TV channels 5 and 6 for AM migration • Most proposals before the Commission reduce the technical standards for AM • The Commission should support FM migration and remove all foreign ownership restrictions on the AM band
Robert Greenlee	<ul style="list-style-type: none"> • Supports all technical proposals made by Du Treil, Lundin & Rackley, Inc.
Just Because, Inc.	<ul style="list-style-type: none"> • Rejects the use of an FM translator and wants to use a new antenna design that is shorter and does not use a ground system
MonsterMedia, LLC	<ul style="list-style-type: none"> • Supports proposal to open FM translator filing window for AM licensees
Larry Langford, WGTO	<ul style="list-style-type: none"> • The FCC should look into allowing single frequency networks with low power translators to allow AM stations to better serve the populated areas now covered by their daytime contour • The translator should be locked into the license of the AM station that applied and was granted • Standalone stations, those that do not have a full power FM in the same market, should be given preference, and Class C and D stations should be given a preference over Class A stations • The ratchet rule should be abolished • Stations should be allowed to use antennas that do not meet a minimum standard • The Commission should reduce or eliminate most of the night protection for distant high power stations • The Commission should mandate minimum standards for AM receivers and limit AM transmitter modulation to 95% negative
John Wishon	<ul style="list-style-type: none"> • Supports AM stations purchasing FM translator
Hatfield & Dawson Consulting Engineers, LLC	<ul style="list-style-type: none"> • Opening an AM-only window for FM translators will not meet the demand from AM licensees • Recommends a rule which allows the 60 dBμ contour of the translator to extend to at least the 25 km (not miles) radius from the AM transmitter site without regard to the AM station's daytime coverage limitations • Community coverage requirements should be eliminated

	<ul style="list-style-type: none"> • Supports elimination of the ratchet rule • Supports the proposed amendment of the MDCL rules • A minimum allocation value should be used for antenna standards • The biggest problem for Am stations is the electrical noise level, not interference • The 1610 kHz frequency should be used by AM stations, and 530 kHz should be added for Class B station use • Class A station power should be increase to 100 kW for day and night • Hatfield & Dawson provides a number of other recommendations pertaining to facilities, moment method proofs, and non-technical administrative matters
<p>Grant County Broadcasters, Inc. (advocating for FM broadcasters)</p>	<ul style="list-style-type: none"> • Using FM translators will turn AM stations into FM stations and ultimately harm the FM band • Use spectrum from channels 5 and 6 for the FM band and the AM stations that will be converted to FM • An AM solution is for the Commission to regulate the quality of AM receiving sets • NRSC filtration standards should be repealed • IBOC degrades AM station transmissions • The ratchet rule should be eliminated
<p>Spring Arbor University</p>	<ul style="list-style-type: none"> • The Commission’s proposal for easing of the 5 mV/m coverage requirement for the city of license is of direct concern • Modify part 73.22(i) of the community coverage rules • Open FM translator filing window exclusively for AM licensees and permittees • Permit “mating” for FM translators that have already been permitted by the FCC • FCC should consider allowing an AM station to purchase an existing FM translator in a market where there is no room for a “new” translator application
<p>Sean Scallon</p>	<ul style="list-style-type: none"> • Increase power for nighttime broadcasts • Allow AM stations access to FM translator
<p>R. Morgan Burrow</p>	<ul style="list-style-type: none"> • Proposal A: FM translators should be made available for standard broadcast stations, who should be permitted to apply for one translator outside a filing window • Proposal B: maintain the “community of license” concept • Proposal C: Maintain the present skywave propagation curves, which standardizes the United States with ITU-R P • Proposal D: eliminate the “ratchet” because it has prevented AM stations from improving service to the public because it is expensive or the station have had to reduce power • Proposal E: New techniques are encouraged so control power consumption so long as the quality of music is preserved • Proposal F: Modify the 85% RMS (efficiency) standard for a

	<p>directional antenna by permitting additional transmitter power in a 302 application</p> <ul style="list-style-type: none"> • Increase the nighttime protected contour for Class A stations to 1 mV/m • Increase the daytime protected contour for all US Class A stations from .1 to .5 mV/m • Increase the third adjacent contour to 50 mV/m to discourage spurious emissions • Renegotiate US/Canadian and US/Mexican agreements to relax the restrictive daytime second-adjacent contour protection • Authorize allocation field intensity measurements to and from Mexican stations • Permanently grandfather US Class C stations at 1 kW operation • Revise the 1954 R-3 (M-3) soil conductivity map
Summit Media Broadcasting, LLC	<ul style="list-style-type: none"> • Use the channel 5 or 6 TV spectrum to create a new service and move all AM licensees to a newly created band • A present AM operator in rural America that has an open Class A FM frequency in the same city of license as the AM station, would be permitted to turn in their AM channel in exchange for an open Class A FM frequency that it finds without having to go through an auction, just a plain trade-in of the AM license for the FM license. • Secondary support for permitting AM stations to apply for 250 watt FM translators
Bemidji Radio, Inc.	<ul style="list-style-type: none"> • The FM translator window should be open for all AM stations and no AM daytime only preference should be awarded. • Cross-service AM/FM translator rules should be modified to permit the FM translator to be located anywhere within the 2 mV/m contour of the AM station • Purchase of an existing FM translator for use and pairing with an AM stations should be allowed a one time “Major Change” filing waiver of up to 100 miles site to site as a “minor change”. • Reduce AM station daytime community coverage requirement to 50% of Community Boundaries within 5 mV/m • Reduce AM station nighttime community coverage requirement to 50% nighttime interference-free contour • Does not support relaxation of the Ratchet Rule unless there is a similar relaxation in the Night Sky-wave protection requirements for all stations • Oppose the proposal to modify AM antennae efficiency standards
Dana Puopolo	<ul style="list-style-type: none"> • Oppose proposal to open one-time FM translator window. The Commission should allow AM stations the flexibility to move any FM translator up to 100 miles and allow frequency changes within the non-reserved band • The Commission should allow daytime power increases by AM stations up to the maximum power allowed, which will allow them to overcome interference

	<ul style="list-style-type: none"> • AM stations should be allowed more flexibility in transmitter siting and to use whatever antenna is possible • AM stations should be allowed to receive waivers from maintaining city of license minimum field strengths • The Commission should crack down on those who cause AM interference • AM IBOC (a buzz type sound that jams the frequency) should be banned, at least at night • The Commission should allow AM stations to negotiate between themselves to allow mutual interference
North Carolina Central Broadcasters	<ul style="list-style-type: none"> • The Commission should open an FM Translator Filing Window exclusively for AM licensee and permittees
Du Treil, Lundin & Rackley, Inc.	<ul style="list-style-type: none"> • FM frequency availability will limit the extent to which AM stations are able to use FM translators • AM stations should not be licensed to cover communities • The ratchet rule should be eliminated • Supports wider implementation of modulation dependent carrier level control technologies • Minimum antenna efficiency requirements should be eliminated from the rules – AM stations should have complete flexibility in choosing tower height and ground system dimensions • The daytime protected contour level for Class B, C and D stations should be raised from 0.5 mV/m to 2.0 mV/m, a level that is more representative of the signal levels needed to overcome present day noise levels. • Make the protected contour for daytime co-channel overlap, daytime first-adjacent channel overlap, daytime critical hours protection and nighttime overlap from co-channel skywave signals the 0.5 mV/m groundwave contour for Class A stations. • First-Adjacent Daytime Protection Ratio should be returned to 0 dB • Nighttime protection should be based on protected station RSS calculations using 50% exclusion – the method that was in use for decades before the “Ratchet Clause” • Calculation of nighttime interference protection for Class B and Class C stations should be standardized to use only site-to-site RSS calculations • The method for calculating nighttime protection should be changed back to consider only co-channel RSS contributions, • The rules should be changed to specify the formerly-employed nighttime skywave model for calculations over paths between stations outside the Continental United States. • Domestic AM radio stations should be able to make changes without regard to received daytime overlap from foreign stations, as long as such foreign stations are protected from receiving overlap under applicable international agreements. • AM stations should be able to improve their signals by entering into agreements with other stations to modify their facilities or remove them from the air as they choose to do so. • Bandwidth mask should be changed to specify rolloff of frequencies above 6 KHz from carrier frequency, and the standard “NRSC” pre-emphasis specification should be eliminated

	<p>altogether.</p> <ul style="list-style-type: none"> • The requirement for annual spectrum measurements to be placed in stations' public files is unnecessary • Allocation standards should be created for use in the expanded band between 1610 and 1700 kHz • Only radials specified for monitor points should be required to be measured for a DA partial proof of performance. • A revised R-3 Map should be developed because it is outdated • The present requirement that directional antenna systems licensed using computer modeling (with MoM proofs) have recertification measurements performed every two years is not necessary and should be eliminated. If not eliminated, the requirement should be modified. • The rules should be changed to allow software to be used for MoM modeling without further study as long as the model geometry does not result in errors according to its internal diagnostics. • Exemption of the array geometry survey filing requirement for existing stations running MoM proofs that has been adopted by the FCC as policy should be explicitly stated in the rules, and expanded to recognize that proofs based on field strength measurements in the past demonstrate that the array geometry is correct for any DA pattern using an identical tower geometry • The limitation on the total capacitance used in MoM proof models embodied in the rules should be clearly stated to only apply when the total capacitance used to model base region effects exceeds 250 pF • The requirements for MoM proofed DA pattern maintenance when changes are made above the base of a tower, such as changing guy wire insulators or a tower-mounted antenna, should be stated in the Rules.
Robert E. Richer	<ul style="list-style-type: none"> • The US should use the Crossed Field Antenna, which is in development in the US and has been used in other parts of the world, because it removes the need for FM translators and can deliver a higher quality signal
Joshua Lehan	<ul style="list-style-type: none"> • Extend the AM broadcast band to 1710-1800 kHz
Scott Todd	<ul style="list-style-type: none"> • Expand the FM band and license VHF channel 5 and 6 spectrum as a shared service • Limit allowing more power at night to stations which are the only ones serving their markets or towns with 4 or less stations • The FCC should increase its enforcement of power line noise • Reduce the percentage of coverage to the city of license • The primary emphasis needs to be on digital and lighting hash elimination
Josh Johnson	<ul style="list-style-type: none"> • Allow each AM operator to apply for an FM to rebroadcast AM programming • Eliminate the ratchet rule
Frederick Vobbe	<ul style="list-style-type: none"> • Instead of using FM translators, deployment of low power synchronous AM transmitters to fill in dead areas should be used • The Commission should reconsider eliminating the AM ratchet rule • The Commission should hold all devices and sources of radiated signals to the same field strength limits in Part 15 and actively enforce compliance

	<ul style="list-style-type: none"> • The Commission should fast-track channels 3 and 4 for digital radio use • The Commission should enact a receiver standard mandating all mobile receivers be capable of receiving the full AM transmitted signal
Thomas G. Osenkowsky	<ul style="list-style-type: none"> • The Commission should allow licensees flexibility in locating their transmitter sites instead of concerning itself with “city of license” • The FCC should rescind the ratchet rule • Minimum efficiency standards for tower installations should not be included in the rules • The Commission should permit standalone AM daytime stations to commence their broadcast day at 6 am
The RAFTT Corporation	<ul style="list-style-type: none"> • The 25 mile limit on FM translators should be completely eliminated. The limiting relationship should be that the 60 dBu contour of a translator not extend beyond the 2 mV/m daytime contour of the AM station • Mattoon Waivers should be codified • Daytime only AM stations should be allowed to operate 6 AM to 6 PM local time • The FCC should open expanded band frequencies 1610 kHz – 1700 kHz to more use and allow 530 kHz stations
Pepin County Department of Human Services	<ul style="list-style-type: none"> • Repeal the ratchet rule and in the alternative allow an FM translator
Burt I. Weiner Associates	<ul style="list-style-type: none"> • Random FCC inspections of broadcast transmitter facilities should be reinstated • The rules regarding AM modulation levels that allow negative peaks to 100 percent should be rewritten. Negative modulation amplitude of 100 percent results in carrier cutoff that more often than not produces buckshot and/or splatter. The rules should clearly specify a maximum negative peak modulation of 96 percent • All Broadcast FM receivers must have a Broadcast AM receiver section with a minimum standard of performance, not limited to just acceptable bandwidth, but overall sound fidelity. • Rejects the use of FM translators for the AM broadcast band • Authorizing higher power for AM stations will only create more man-made noise
Martha Whitman	<ul style="list-style-type: none"> • The Commission should permit FM translator licensees to modify their facilities through the Minor Change Process to operate on any FM channel • The Commission should allow an FM translator licensee or permittee to serve as an AM fill-in translator to displace an LPFM station to an alternate FM channel • Intermediate Frequency protection threshold should apply only to an ERP in excess of 250 watts • After operating an AM fill-in translator, the Commission should allow the AM station licensee to discontinue operation of the AM station and surrender the license while maintaining operation of the translator

Douglas B. Wilber	<ul style="list-style-type: none"> • Reallocate some of the band that TV channels 5 & 6 had been located on • Allow current AM licensees to trade in their AM licenses for a comparable FM license on an expanded FM band.
George Molnar	<ul style="list-style-type: none"> • The Commission should reduce pollution of the radio spectrum
Common Frequency	<ul style="list-style-type: none"> • AM licensees should be limited to one FM translator per AM station • No filing window for translators should be enacted until the LPFM 90-day Settlement Window Period occurs • The FCC should expedite 250-watt upgrade opportunity before opening another FM translator auction • Licenses should be made available for both LPFM and translator service • There should be an incentive program for AM licensees to donate their licenses to non-profit groups and educational institutions
Cub Radio, Inc.	<ul style="list-style-type: none"> • The FCC should open an “FM Translator Filing Window” exclusively for AM licensee and permittees • Each translator should be “locked” into the AM license so they cannot be sold separately
School District of Durand	<ul style="list-style-type: none"> • Repeal the ratchet rule so that WRDN can raise its nighttime power • Allow FM stations to file for an FM translator
WRDN	<ul style="list-style-type: none"> • Permanently assign FM translators to AM stations • Support repeal of the ratchet rule • Enforce Part 15 interference rules for consumer electronics • Move back the Pre-Sunrise Authorization to 5 am • Expand broadcast width • Test other digital platforms • Eliminate the requirement for overlapping coverage when moving a current FM translator • Allow AM station to transfer to full power FM without going through auction process
Wifredo G. Blanco	<ul style="list-style-type: none"> • AM stations should be synchronized • AM stations should have the right to expand the signal contour • Supports eliminating the ratchet rule
James B. Potter	<ul style="list-style-type: none"> • Transmitter Power Outputs ranging from 150 to 300 Watts would be adequate to meet the needs of small American towns • Open the filing window for LPAM stations to be year-round • Reduce the signal service contour protections for all existing station classes by a factor of 3 or 4 • Permit simple 2-tower directional arrays only for simple patterns to protect co-channel stations • Raise the maximum positive modulation percentage to 250% to maximize RF sideband audio output • Disallow FM translators for LPAM service • Eliminate required power reduction sunset through sunrise, and standardize sunrise as 6 AM and sunset as 6 PM local

	<ul style="list-style-type: none"> time Eliminate the ratchet rule
Broadcast Warning Working Group	<ul style="list-style-type: none"> The Commission should start enforcing Part 15 for the AM band to reduce interference There is too much modulation of AM transmitter carriers, which is causing “splatter” It may be time to turn off IBOC (Digital AM) FCC should open new proceeding to consider the use of 530 KhZ Stations should be allowed authority until 6 PM local time AM stations should be allowed to use any antenna/transmitter that will work, with no minimum efficiency Use of synchronous AM detection will improve the AM band Manufacturers should not be allowed to market FM-only receivers
Curtis W. Flick	<ul style="list-style-type: none"> Rejects allowing AM stations to have FM translators and proposes instead to allow AM licensees to build and simulcast on-channel synchronous AM booster stations within their contours and hours of operation Eliminate the ratchet rule Allow discretion in use of modulation dependent carrier level control technology so long as it does not cause harmful interference to other stations Eliminate minimum efficiency rules for antennae
David Caroccio	<ul style="list-style-type: none"> AM Stereo should be reintroduced Broadcasters should use 15 Khz instead of 10 Khz if the bandspace is available
Seehafer Broadcasting Corp.	<ul style="list-style-type: none"> The FCC should open an FM translator filing window exclusively for AM licensees and each translator should be locked into the AM license
F. Stephen Masek	<ul style="list-style-type: none"> The FCC needs to prosecute those who are the source of improper noise transmission IBOC should be eliminated
Prometheus Radio Project	<ul style="list-style-type: none"> Urges the Commission to delay an FM translator filing window until LPFM applications have been resolved and that eligibility be restricted to Class C and Class D stations only
Mark Heller	<ul style="list-style-type: none"> Supports AM only window for translators and FM translators should be locked into the AM license Act on pre-sunrise and post-sunset requests from Class D stations The Commission should perform an internal study as to the failure of the AM Expanded Band and utilize the abandoned 1705-1800 Khz spectrum Open the 530 Khz frequency Opposes tightening community of license standards for FM stations while relaxing them for AM stations Change peak modulation to 12-% positive and 99% negative Synchronization of similar radio stations on the same frequency will help eliminate flutter and fading at night on the AM band
City of Mondovi	<ul style="list-style-type: none"> Repeal the ratchet rule Allow AM stations to file for an FM translator

Brian J. Henry	<ul style="list-style-type: none"> • AM's real technical problems are interference from non-licensed sources and receiver quality • Allowing FM translators may be helpful in the short term but will backfire in the long term because it will drive listeners away from AM • The Commission should retain existing AM daytime coverage requirements for all stations • License AM broadcast stations to serve particular districts within its current city of license so that at least some part of the community would be guaranteed to receive full-time interference free service • Ratchet rule should be repealed • Create a measurement standard that stations could implement to ensure that modulation (MDCL) is performing optimally • There should be a specified inverse field that must be attained at one kilometer from the transmitter site for a given class of service • The FCC should more vigorously enforce all existing technical rules and reinstate a policy of making routine inspections • Consider re-establishing the requirement that AM broadcast licensees retain FCC licensed operators to maintain a station's transmission equipment. • The Commission should authorized full AM digital operation at the broadcaster's discretion in lieu of analog operation • By limiting positive and negative AM envelope modulation peaks to 100%, the benefits of low distortion symmetrical audio and its resultant clean transmitted RF spectrum can be realized while achieving a modest reduction of interference to the first and second adjacent channel as well. • There should be an analog quality standard for AM broadcast modulation from 50 Hz to at least 7.5 kHz with a 10 kHz receive notch filter and low audio frequency distortion • To overcome high local noise levels, AM broadcast transmission facilities should be encouraged to maximize their signal over the entire city of license using whatever means possible without adversely affecting other licensed operations.
Steven Karty	<ul style="list-style-type: none"> • AM stations should be allowed to increase their analog bandwidth to 15 kHz
Malkan Interactive Communications, LLC	<ul style="list-style-type: none"> • Wants an FM translator signal
Wayne Robey	<ul style="list-style-type: none"> • Focuses on radiation emission limits and part 15 and 18 devices
Steven Chanin	<ul style="list-style-type: none"> • Supports availability of FM translators because it is not subject to end of day broadcast restrictions
Peter E. Schartel	<ul style="list-style-type: none"> • Supports proposal to give AM stations FM translators but the mileage or existing signal strength requirements should be relaxed
John Pavlica, Jr.	<ul style="list-style-type: none"> • Address interference issues with stricter FCC enforcement and additional AM transmitter power • Eliminate IBOC

	<ul style="list-style-type: none"> • AM transmission should be limited to 99% negative modulation and 125% positive modulation • AM stations should be allowed to use reduced carrier compatible AM, with either single sideband audio or vestigial sideband (1.5 KHz bandwidth) operating in monophonic service and up to 10 dB carrier suppression in stereophonic service at the option of the licensee. • Mandate minimum AM receiver standards such as any FM stereo radio must also decode AM stereo with a 7.5 KHz audio bandwidth and include impulse noise reduction technology. • Improve their audio chain with audio out to the specified 10.2 KHz audio bandwidth thru their entire audio chain to the transmitter. They could also switch-on their dormant CQUAM AM stereo hardware, especially music format stations and those broadcasting stereo sporting events on the AM band. • Every AM station should have the opportunity to license an analog FM translator and the FCC should reassign the bandwidth of channels to accommodate it • The daytime coverage requirement should be 50% of its community of license • The new 750KW-1MW clear-channel AM “superstations” (Class A) should still receive nighttime skywave protection from interference • The ratchet rule should be redacted except for a nighttime emergency exception • Should not allow use of MDCL technology on the AM band
Crawford Broadcasting Company	<ul style="list-style-type: none"> • Support use of FM translators and exclusive window, and permanently linking them • Does not support limiting FM translators to certain classes of AM stations or limiting eligibility to stand-alone stations • The Commission should permanently exempt AM-linked translators from overlap requirement • We agree that the proposal to modify the daytime community coverage requirement contained in §73.24(i) of the Rules, for licensed AM stations only, to require 50% community area or population coverage with a daytime 5 mV/m signal. New stations should be required to provide full community coverage. • Nighttime community coverage standards should be eliminated for existing AM stations • The ratchet rule should be eliminated • There should be some notification mechanism through CDBS wherein a station’s record indicates that MDCL operation has been implemented. • Some minimum value should be retained to force some degree of uniformity in antenna design and construction, propose 25% • The Commission should, in a separate Notice of Inquiry or Rulemaking, visit the idea of eliminating skywave service area protection for class A AM stations. • Some level of interference protection should be afforded to translators permanently linked to AM stations • The Commission should review its rules and policies about radiation from power lines

William Croghan	<ul style="list-style-type: none"> • Enforcement of Part 15 rules to reduce interference
Robert A. Meuser	<ul style="list-style-type: none"> • Class D stations should first receive FM translators • The Commission should consider allowing stations to eliminate night time directional service to be replaced by a translator or similar FM service • Supports the use of MDCL • Minimum efficiency standards should be eliminated completely with the exception of Class A stations • Stations moving to the 530 kHz band should be allowed to use their existing towers
Henry B. Ruhwiedel	<ul style="list-style-type: none"> • Ban BPL internet over power lines • Enforce Part 15 of the rules • Eliminate IBOC • Limit AM transmission to 99% negative modulation and 130% positive modulation • AM stations should be allowed to use reduced carrier compatible AM, with either single sideband audio or vestigial sideband (1.5 KHz bandwidth) operating in monophonic service and up to 10 dB carrier suppression in stereophonic service at the option of the licensee. • The Commission should permit a new service to augment the loss of any AM night time service
Matt Krick	<ul style="list-style-type: none"> • Analog receivers should be required to use a synchronous type detector • All radios should be designed with a minimum of 9 kHz audio bandwidth by using a 20 or 25 kHz wide IF filter
David Dybas	<ul style="list-style-type: none"> • Limit the maximum nighttime power level for Class A stations to no more than 10 kW • AM digital modulation should be eliminated
Nickolaus E. Leggett	<ul style="list-style-type: none"> • Upgrade Part 15 power limits • The FCC should allow specially credentialed engineering firms and individual professional engineers to build and test AM broadcast radio equipment for their customers. • The Commission should also allow AM broadcasters' greater freedom in designing their own antenna systems. • The Commission should approach Congress about the possibility of providing subsidies to AM broadcast stations that install special equipment to deal with emergencies.