

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

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

**COMMENTS OF  
THE TUSCARAWAS BROADCASTING COMPANY**

The Tuscarawas Broadcasting Company (“TBC”), licensee of WBTC (AM) in Uhrichsville, Ohio and WNPQ (FM) in New Philadelphia, Ohio, hereby submits its Comments in the captioned proceeding, titled *Revitalization of the AM Radio Service*, MB Docket No. 13-249, released Oct. 31, 2013 (“NPRM”). Briefly, TBC supports any Commission proposal to strengthen the AM radio service, which has long suffered from all of the deficiencies specified in the Commission’s NPRM

WBTC is authorized to operate at .25 kW during daylight hours, but must reduce its power to .005 kW (*i.e.*, 5 watts) during nighttime hours. This raises two problems. First, it is difficult for WBTC to serve its community of license in compliance with the FCC’s coverage requirements as noted in Section III C. of the NPRM.

More importantly, however, five watts is simply not enough power to serve the station’s area of license with breaking news, weather alerts and the many popular high school sporting events covered by the station. WBTC is an important source of local news and weather alerts that truly serves the community with critical information that could mean the difference between life and death in an emergency situation such as a tornado or other severe weather condition.

Additionally, there are numerous high schools within WBTC’s daytime listening area, but many of the popular high school sports broadcast on WBTC, such as football, basketball and

wrestling, have meets or games that take place after dark. As a result, many of the parents, friends and relatives of the players who are unable to attend the games are also unable to hear the broadcasts of those games and meets.

For these reasons, TBC urges the Commission, at the very least, to adopt its first and most critical proposal to open an FM translator filing window that would be available only to AM licensees. FM stations do not have the same requirements to reduce or completely shut off nighttime service that face many AM broadcast stations, who are in desperate need of regulatory relief due to this severe nighttime disadvantage. In addition to providing a much needed increase in nighttime coverage, FM translators would also provide a higher quality audio signal to the AM listening audience, a benefit that would be appreciated by WBTC's listeners 24 hours per day.

Currently, only a small percentage of WBTC's listeners are able to hear the high school sporting events and meets that are held and broadcast in the evening. These events are not covered by any other medium....not by FM or TV or any other source of live media entertainment. It could be argued that nothing exemplifies service to the public more than the broadcast of local high school sporting events. Indeed, these events are often the lifeblood of the local community and nothing does more to bring the community together than the spirit engendered by these games, whether appreciating them in person or by radio while the area's residents go about their other activities. The inability of the listening public to hear the broadcasts of these local games and meets is almost criminal, especially when FM translators could easily resolve this problem.

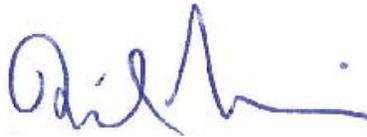
The same small percentage of population that can hear those nighttime sporting events is also the population that is able to hear any emergency news or weather events that could require immediate action to be taken for the preservation of life or safety. With just five watts of nighttime power, most of WBTC's listening audience could be left at risk in such events.

The severely limited nighttime power allotted to WBTC not only limits the station's nighttime audience for sports, news and weather, but it threatens the station's very existence. A station cannot sell advertising at normal rates, if at all, when only a small percentage of the station's daytime listening area can receive the station's signal. Indeed, even during daytime hours, AM radio is at a severe disadvantage to its FM competitors by virtue of the inferior signal quality of AM stations. AM radio is not viewed as attractive to advertisers as FM, and this yet another reason why FM translators could be critical to the continued existence of AM radio.

In summary, the Commission owes it to AM broadcasters to do whatever it can to strengthen and preserve AM radio and thereby serve the public interest as it is statutorily required to do. Opening an FM translator filing window for AM stations only would be a good and important start in that direction, although TBC supports all of the Commission's proposals.

Respectfully submitted,

**THE TUSCARAWAS BROADCASTING  
COMPANY**



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