

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC

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

TO: Honorable Marlene H. Dortch
Secretary of the Commission

Accepted/Files

JAN 15 2014

ATTN: Peter H. Doyle
Chief, Audio Services Division, Media Bureau

Federal Communications Commission
Office of the Secretary

COMMENTS OF BOB MARK ALLEN PRODUCTIONS, INC.

Bob Mark Allen Productions, Inc., licensee of daytime only AM broadcast station KJIM, 1500 kHz, Sherman, Texas (Facility ID 65590), hereby submits comments with respect to the above-captioned Notice of Proposed Rulemaking (FCC 13-139), released on October 31, 2013 ("NPRM") and published in the Federal Register on November 20, 2013. In support thereof, the following is set forth.

KJIM, a daytime only station which operates directionally, first began operations on December 19, 1947; KJIM is the only radio station licensed to Sherman, Texas. Because of its daytime only status and inability to provide service to its listeners during evening hours, the elements of diversity of programming, localism and financial viability or competitiveness are substantially and negatively impacted. Accordingly, the NPRM's proposal to open a filing window for the sole and limited purpose of allowing existing AM stations to receive authorizations for a new FM translator (one FM translator per AM station for the sole purpose of rebroadcasting the AM station within the lesser of the 2 mV/m daytime contour of the AM

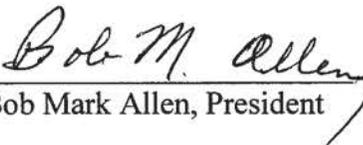
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station being rebroadcast and a 25 mile radius from the AM transmission site) would greatly benefit the AM service and its ability to serve the public.

However, due to the scarcity of frequency spectrum available for FM translators, the Commission should grant a preference or priority to daytime only AM stations in the proposed filing window. For daytime only AM stations, their ability to obtain an FM translator is not just a matter of enhancing existing service to the public, it offers an opportunity for such stations to provide service to their audiences in evening hours where no such service is currently possible. Accordingly, in instances where there are mutually exclusive AM applicants for an FM translator, the daytime only AM applicant should receive a preference for the available frequency as this would best promote the public interest by enhancing diversity, localism and competition in the AM service.

Respectfully submitted

BOB MARK ALLEN PRODUCTIONS, INC.

By: 
Bob Mark Allen, President

January 15, 2014