

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

In the matter of:

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

COMMENTS OF CARL T. JONES CORPORATION

Carl T. Jones Corporation, an engineering consulting firm, hereby submits comments responding to the Commission’s October 31, 2013 Notice of Proposed Rulemaking (“NPRM”) in the above-captioned proceeding¹. In the NPRM, the Commission requested comments on specific proposals and invited the submission of additional proposals.

Carl T. Jones Corporation (“CTJC”) provides technical assistance to the AM broadcaster, supporting development of new and improved transmission facilities. The company has been engaged in these endeavors continuously since 1935. Over this period there have been significant

¹ The Notice of Proposed Rulemaking, MB Docket No. 13-249; FCC 13-139, was published in the Federal Register on November 20, 2013, and a Comment Date of January 21, 2014 was established (78 Fed. Reg. 69629). On January 21, 2014, the Federal Government was closed due to weather. Accordingly, pursuant to Section 1.4(j)(1) of the FCC Rules, these Comments, filed the next business day after the Commission’s Headquarters were closed, are considered timely.

changes in the government's technical regulatory standards as well as the number of stations occupying the AM band.

Again a major revision of technical standards is being considered looking toward a "revitalization" of the AM service. We have reviewed the Commission's NPRM and offer comment on the technical proposals advanced. We also offer a few additional proposals for consideration and look forward to review of additional proposals from other interested parties.

FM Translator Window Exclusively for AM Licensees and Permittees

We support giving AM Broadcasters an opportunity to file for an FM Translator to fill-in their radio service. We agree that the new FM translators providing AM fill-in service should be tied to the parent AM station. We note that the existing rules for FM Translators providing AM fill-in have worked extremely well. The most valuable aspect of such fill-in translators in revitalizing the AM broadcast service is that they offer nighttime service in an area the AM station has good daytime service but diminished, or no, nighttime service. With this in mind, it makes sense to give preference to AM stations with limited night service in their primary daytime coverage area over applicants with AM signals that provide strong nighttime coverage in their daytime service area. Exactly how this preference to weaker AM night signals is implemented in a translator filing window needs further study (perhaps Class D stations would get priority). We agree that any new translator filing window should be limited solely to AM station licensees. The Commission's proposal to limit an AM station to having no more than one translator ensures protection of this limited resource, however, this limit may be too restrictive in

certain instances where an AM station's nighttime service area is severely restricted compared to the daytime service area. It is suggested that the Commission consider limiting the number of translators available to an AM station to a maximum of two.

Daytime Community of License Coverage Standard

The present requirement that an AM station must provide coverage to 100% of the community-of-license ("COL") with its 5 mV/m contour is often burdensome to AM station owners seeking to relocate their tower site while offering little benefit to the listening public. It is believed that some basic level of COL coverage should continue to be required, but that the requirement may be reduced to 50% (both community area and population) with little or no effect on the AM station's ability to serve its community. Relaxing the COL coverage requirement as proposed herein would allow new relocation opportunities for an AM tower site. Land acquisition costs could be significantly reduced and zoning issues eased as broadcasters are permitted to relocate their tower site to less built-up areas, thereby possibly revitalizing the business model for an AM station. A new applicant for an AM license will most likely be required to implement a complex directional array in order to meet the protection requirements to all existing co-channel and adjacent channel stations. Such facilities require large parcels of land that are difficult, if not impossible, to acquire near urban and suburban areas. In order not to preclude these new applicants from providing a new service to a community, it is believed that the same 50% COL requirement should be applied to new applicants as well as exiting licensees.

Nighttime Community of License Coverage Standard

Until April 1992, Class C stations were only required to meet daytime coverage requirements. We believe this requirement should be reinstated since most Class C assignments continue to fail to meet today's night coverage requirement primarily due to their high nighttime interference-free service contours. Further for all Classes of stations the nighttime COL requirement is the most restrictive requirement for siting or relocating an AM station. Therefore we believe that eliminating the nighttime community of license coverage requirement for all classes of stations would be of significant benefit to the AM Broadcaster as well as the community. Such a change could give significant relief to AM broadcasters by opening up a much larger search area in which to locate their tower site as land acquisition costs could be significantly reduced and zoning issues eased. We support such a change in the nighttime coverage requirement for existing licensees, as well as, new applicants for AM facilities.

AM "Ratchet Rule"

We believe that the AM Ratchet Rule should be eliminated as soon as possible.

Modulation Dependent Carrier Level ("MDCL") Control Technologies

The record to date is overwhelmingly favorable with regard to the use of MDCL technologies in the AM broadcast service. Indeed, it has been shown that the use of the various implementations of this technology can significantly reduce power consumption, providing much

needed financial relief for the AM Broadcaster, without compromising the station's service area or service quality. We fully support the Commission's proposal to allow use of these technologies by simple notification.

AM Efficiency Standards

We support permitting proposals that differ from the current minimum efficiency requirements provided that proposed radiation efficiency characteristics coupled with proposed power level meet a minimum specified performance standard for the station class.

Additional CTJC Proposals

In addition to the topics listed in the NPRM, CTJC submits the following suggestions to further the Commission's goal to revitalize the AM Radio Broadcast Service:

Decrease Interference Protection Criteria

It is generally agreed that the noise level from man-made sources has noticeably increased in the AM frequency band. Because of this, it is no longer beneficial to protect a daytime AM station signal level of 0.5 mV/m in most areas of the country. However, careful

consideration must be given to the negative impact that would result from raising the level of the daytime protected contour to a value that would significantly harm service in rural areas. With this in mind, we believe that raising the daytime protected contour level to 1 mV/m is reasonable. Such a change would allow many licensees to increase power or otherwise improve their facilities and service to the public without in actuality increasing interference. While at the same time it is believed that the proposed increase in the protected service contour would not significantly raise the potential for interference in rural areas where noise levels are lower.

We also support modifying the adjacent channel protection criteria in the following manner: (i) restore the protection ratio for first-adjacent channel signals to 0 dB; and (ii) change the second-adjacent channel protection criteria to the present day third-adjacent channel requirement of prohibiting overlap of the 25 mV/m contours. It is believed that this relaxation of the adjacent channel protection criteria will allow licensees to improve their service to their communities while not significantly raising the potential for interference.

Reduce Requirements for Interference Reduction Agreements

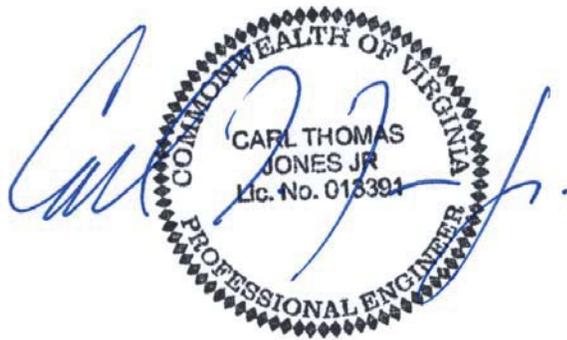
Over the years, the FCC administrative restrictions to implementing Interference Reduction Agreements (“IRA’s”) between AM station owners have become overly burdensome thereby reducing the potential benefit to the listening public. We recommend developing less restrictive guidelines for IRA’s so AM Broadcasters may readily work amongst themselves to make more efficient use of the AM band without overbearing regulatory involvement. This will improve the opportunity to revitalize the AM Radio Broadcast Service.

Method of Moment Recertification Requirements

It is believed, based on this firm's experience, that the recertification interval for antenna systems licensed under the Method of Moments criteria should be extended from the present 24 month requirement to a 48 or possibly a 60 month requirement.

These and other innovative ideas put forward by various commenters will go a long way toward the Commission's goal of revitalizing the AM Broadcast Radio Service.

Respectfully Submitted, January 22, 2014



Carl T. Jones, Jr., P.E.
Carl T. Jones Corporation
Consulting Engineers
7901 Yarnwood Court
Springfield, VA 22153
(703) 569-7704