AM REVITALIZATION: MM DOCKET 13-249

REQUEST TO ELIMINATE MAKING A COMPLETE NON DIRECTIONAL ANTENNA PROOF OF PERFORMANCE FOR NON DIRECTIONAL AM STATIONS USING AN AERIAL RADIAL SYSTEM.

If the FCC wants to revitalize the AM band it does not make sense to make it burdensome to replace a ground system or built a new one using aerial radials by requesting in each CP to make a complete non-directional proof of performance taking measurements on six radials.

I have previously installed aerial radials for WAPA-AM San Juan, P.R. (two tower directional at night) and WA2XPA-AM Arecibo, P.R. (non-directional). For both CP's the FCC requested a proof of performance to demonstrate the tower system has the proposed efficiency. WUNO-AM installed too the aerial radial system in Puerto Rico for their directional array.

I have demonstrated already that 4 (wire) aerial radials meet the efficiency standards. Is it necessary then to request an AM station to make a six radials proof of performance when proposing a four or a six aerial radials system with cables 5% longer than a quarter-wavelength?.

Does it make sense to stop a non-directional station to go back on the air from a new site until a complete non-directional proof of performance for the aerial radials is made and the proof of performance is verified by the FCC?

If a conventional ground system is used no proof of performance is requested in the CP and the station can immediately start operations with automatic program tests from the new site with automatic program authorization.

STATIONS ARE changing to AERIAL RADIAL SYSTEMS in PUERTO because the buried copper ground system is being stolen. Please understand the reality of AM stations and the extremely difficult economical situation.

I would respectfully request to exempt non-directional AM stations using an aerial radial system from taking measurements on six radials and filing the proof of performance that is now being requested on the CP. If the aerial radial system has at least 4 (wires), equally spaced, 5 percent longer than the quarter-wavelength it would meet the efficiency standards.

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(ENG. BLANCO-PI FILED TOO COMMENTS ON AM SYNCHRONOUS BOOSTERS PERMANT LICENSING, these comments on aerial radials are in addition to those already filed)