

REPLY COMMENTS OF WILLIAM C. WALKER
TO NICKOLAUS E. LEGGETT N3NL AND DON SCHELLHARDT, ESQUIRE KI4PMG

AM Band Revitalization: FCC Docket 13-249

I am William C. Walker, a longtime advocate of Low Power AM (LPAM) radio stations. I founded, and now lead, THE LPAM NETWORK. I am also General Manager of WILW.

A. Please Take Favorable Action In FCC Docket RM-11287

I strongly support Nick Leggett and Don Schellhardt in calling for the licensing of Low Power AM (LPAM) stations.

The need for such stations is particularly pressing because the FCC has imposed an overly narrow range of standardized wattage on Low Power FM (LPFM) community radio stations. The exclusion of stations below 50 watts has led to under-representation of LPFM stations in many urban areas. Meanwhile, the exclusion of stations above 100 watts has hindered the financial viability of potential LPFM stations in small towns and rural areas.

The Commission has already received public comments on LPAM in Docket RM-11287, but the Docket remains in limbo. That is: The basic proposal for LPAM has not been approved nor rejected. I urge the Commission to re-open this Docket and take favorable action.

In particular, I endorse the specific proposal that was filed in Docket RM-11287 -- by THE AMHERST ALLIANCE, THE LPAM NETWORK and several others -- on April 28, 2006.

First, this is a consensus proposal of all nationally active advocates for LPAM. Second, the proposal would pattern the new LPAM stations, to the maximum extent practical, after the existing 10-watt Travelers' Information Service (TIS) stations. Since TIS stations have triggered few if any complaints about interference, even in highly urban areas, the April 28, 2006 consensus proposal should minimize the risks of interference.

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B. Ideally. Allow LPAM Stations The Option Of Airing Commercials

When Nick Leggett and Don Schellhardt became the first two parties to propose the LPFM Radio Service, in a Petition For Rulemaking of 1997, most LPFM supporters were concerned about the sharp decline in the number of small, local and independent non-profit stations (including those operated by local churches and local colleges). Aided by the Commission's phased reduction in the number of Class D college stations, and the Commission's "blank check" tolerance for "satellators", National Public Radio and evangelical broadcasting chains had combined to drive many small, local and independent non-profits off the airwaves.

The new LPFM Radio Service, despite its current limitations, has certainly eased this first problem.

However, other LPFM supporters were concerned about a second problem: the decline in the number of "small commercial Mom and Pop" stations. Aided by the Congressional requirement for mandatory auctioning of commercial stations on the FM Band, as well as the Commission's acceptance of relatively high media ownership ceilings, regional and national corporations have been able to displace many local "Mom and Pop" stations with corporate outposts that air standardized, out-of-town programming

Unfortunately, because the Commission has decided that no LPFM may air any commercials, this second problem remains essentially unaddressed.

On Air donor acknowledgements can boost LPFM station revenues, but I do not believe they are an adequate substitute for full-fledged advertising.

Commercial-airing LPAMs can help to balance out the 100% non-commercial LPFM Radio Service.

Further, commercial-airing LPAMs can help small, local businesses -- and thus stimulate economic growth in their communities -- by charging affordable advertising rates, far below the prohibitive levels charged by large radio corporations.

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Most friends of small commercial radio have basically given up their hopes for commercial-airing Low Power Radio stations on the FM Band. However, the AM Band, troubled as it may be, is a new frontier -- where new possibilities should be considered.

Respectfully submitted,

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Dated: March 17, 2014