

Federal Communications Commission

Relative to the Docket 13249

I would like to comment on the proposed rule makings regarding the revitalization of the AM radio service.

- Repeal the 0.25:0.5 first adjacent protection ratio at least on an “accept interference to me” basis. It assumed that radios would be improved to the NRSC-1 response curve, which didn’t and won’t happen, and puts a major impediment on signal upgrades due to this prohibited received interference contour.
- Or, increase the protected service contour from 0.5 mv/m to 1 mv/m. Or both.
- Repeal the ‘ratchet rule’ which requires stations making changes to reduce their nighttime interference contribution to below the 50% RSS of other stations, or -10% of existing, whichever is less.
- Give true daytimers which have no nighttime or such low nighttime power that they cannot serve their principal community priority for FM translators.
- Allow true daytimers to apply for a new FM translator at any time with a demonstration of non-preclusion. This would be triggered at two or more additional translator availabilities at the proposed site.

These are rules that could be changed very easily and quickly and that would provide AM Broadcasts instant relief.

Thank you for your time and consideration.

Sincerely,

*Gregory Borgen*

GREGORY BORGEN