

MB Docket No. 13-249 AM Revitalization Reply Comments

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A. AM Translator window:

Initial comments are reiterated in these reply comments.

There has been strong support for the AM translator window. The proposal should be adopted and the resulting window announced at least 6 months in advance to allow AM stations to prepare their applications. Once filed, the Commission should permit applicants to later modify to any channel in the commercial band in order to eliminate conflicts.

The additional changes to rules and policies set forth below are also supported based on comments.

- (1) Provide a protected class for translators that are AM fill-ins similar to LPFM class A. This change should protect translators from being displaced by interference complaints unless they are inside the primary service area of a full service station. AM fill-in translators are now more than a secondary service. For an AM station they represent a vital local service that should be protected. With the maturity of the aural service from FM stations in the United States, service beyond the FCC defined service contour of an FM station should not be protected unless it represents a first or second aural service.
- (2) Retain the Mattoon waiver for use with all translators (AM and FM fill-ins). It has a solid technical basis in the mutual exclusivity rules for full service FMs. Also permit at least two moves including a single Mattoon waiver. It is often necessary to change site, channel, power or HAAT in order to position a translator for move to an AM fill-in position.
- (3) Allow routine minor modifications for translators to any channel in the band, a change that FMs may do currently as a same class minor change form 301 filing. All translators are by definition the same class - class D.
- (4) Allow translators to resolve interference complaints by changing to any channel in the band. This is an extension of the current "displacement" policy which requires that a change in a full power station must cause the interference. The Commission has, in fact, granted one or two of these type changes but it has not become general policy.
- (5) Implement the proposed Tell City waived to facilitate the movement of existing FM translators to serve as an AM fill-in.
- (6) Change the AM fill-in contour for an AM station the 2 mV/m or 25 miles whichever is greater.

B. Modify coverage standards for AM:

(1) Change the present 5 mV/m day coverage requirement to 3.16 mV/m to match the FM requirement. Once the transition to digital occurs, this signal level should be sufficient to serve even urbanized areas. Change the percentage to 50% of the community's area or population to match the expanded band rule. Let the marketplace determine whether high signal levels are worth the cost of transmitter sites and high power transmitters to achieve.

C. Modify the night-time AM limits:

(1) Modify the night-time coverage requirement to 50% of the population or area of the night-time interference free contour to match the expanded band.

(2) Eliminate the night-time coverage requirement for any facility with a nighttime limit of 20 mV/m or higher. Even in smaller communities covering the city of license is impossible for stations with a high night limit, particularly class C stations.

D. AM ratchet rule:

(1) Eliminate the AM ratchet rule.

F. AM antenna efficiency:

(1) Replacement or relocation of AM antennas is difficult, expensive and often impossible based on zoning rules, FAA requirements and expense. It is proposed that the efficiency standards be lowered to 50% of the current standards. Analysis of a test case on 630 kHz using a simple directional antenna at a 1260 kHz site indicated that this lower efficiency is required to utilize its site. Coverage areas can be equalized with increased power if needed.

G. Other proposals:

(1) Permit elevated ground systems to be utilized without imposing a condition of a full proof. There is ample evidence in the record that they work quite well and that their efficiency is equivalent to a conventional ground system.

(2) Permit top-loading of AM antenna's without the requirement of a current distribution measurements which is difficult if not impossible with folded unipole antennas.

(3) Allow AM minor changes to accept new/increased interference as long as there is a net 10% increase in the population served.