

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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

To: The Commission

REPLY COMMENTS OF THE BROADCAST MAXIMIZATION COMMITTEE

The Broadcast Maximization Committee (“BMC”) has filed Comments in the *Notice of Proposed Rule Making*¹ (“NPRM”) in the above referenced proceeding. BMC continues to advocate for the use of television Channels 5 and 6 for AM stations. Despite the fact that there are still a number of digital TV stations operating on Channels 5 and 6 and there is a need to retain those channels for the incentive auction and repacking process, BMC believes that the Commission should consider allowing AM stations to share Channels 5 and 6 with digital TV stations. Other countries, like Canada and Mexico, have recognized that AM stations are in trouble and have been proactively moving their AM stations to the FM band. Mexico and Brazil have announced plans to move their AM stations to Channels 5 and 6. Japan already uses Channel 5 and 6 for radio broadcasting. The Brazilian plan involves the voluntary migration of 540 AM stations to the FM band beginning this year. The BMC believes that, in most cases, TV Channels 5 and 6 can provide viable radio service for substantially all AM stations even if only one of the channels is available in a particular geographic area.

¹ FCC 13-139, released October 31, 2013.

The BMC has reviewed the Comments filed in the NPRM and has determined that fifty five (55) of the commenting parties support the proposition that AM radio stations should be given an opportunity to provide full time radio service in the TV Channel 5 & 6 spectrum². The BMC believes that such a significant expression of interest warrants further FCC action in two ways:

1. Open a Further Notice of Proposed Rule Making which addresses the opportunities and concerns provided in Comments and Reply Comments in the instant proceeding in an effort to find a manageable way to provide for DTV and radio shared use of TV Channel 5 and 6 spectrum in the United States.
2. Consider the shared use of TV Channel 5 and 6 spectrum in the Broadcast Television Spectrum Incentive Auction Proceeding.

Based on the Comments filed in support of AM station shared use of TV Channels 5 and 6 the Commission needs to move forward with a bold and dramatic approach to allow current AM stations an ability to provide uniform, quality service 24 hours per day. For this to occur it is necessary for the Commission to plan for the future by allocating new spectrum. Therefore BMC urges the Commission to issue a Further Notice exploring the use of VHF spectrum for AM stations.

² It is noted that very few Comments expressed any opposition to the concept of allowing AM stations to transition to the CH 5 and 6 spectrum.

Respectfully Submitted,

BROADCAST MAXIMIZATION COMMITTEE

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March 20, 2014

Appendix A
LIST OF COMMENTORS
ADDRESSING THE USE OF TV CHANNELS 5 & 6 BY AM RADIO STATIONS

Scott Clifton	Jackson Radio, LLC *	Alatron, Inc. *
Doug Wilber	Metro Radio, Inc. *	Alabama Media, LLC *
Christopher J Gay	Liberman Broadcasting, Inc. *	Radio Training Network, Inc. *
John S. Gilstrap	Holladay Broadcasting of Louisiana, LLC *	Mississippi Broadcasters, Inc. *
MMTC	Florida Media, LLC *	Sam Brown
Broadcast Maximization Committee	New South Radio, Inc. *	REC NETWORK
Porter County Broadcasting Holding Corp, LLC	Lighthouse Christian Broadcasting Corp. *	RAMS
Radio One Licenses, LLC *	Great South Wireless LLC *	Puerto Rico Broadcasters Association
Blue Chip Broadcasting Licenses, Ltd. *	Brantley Broadcast Associates, LLC *	George M. Arroyo
Multicultural Radio Broadcasting *	Valleydale Broadcasting LLC *	Communications Technologies, Inc
Licensee, LLC *	Wagon Wheel Broadcasting LLC *	BDJ Radio Enterprises LLC & 920 AM LLC
Way Broadcasting Licensee, LLC *	Memphis First Ventures, LP *	Grant County Broadcasters, Inc
Sacred Heart University, Inc. *	Polnet Communications Ltd. *	N. Al Sergi
Crossroads Communications LLC *	Davidson Media Group *	Joshua Lehan
CAAM Partnership LLC *	Gow Communications, LLC *	Scott Todd
WRNJ Radio, Inc. *	WLOH Radio Company *	Mark Heller
Renda Broadcasting Corp. *	Siga Broadcasting Corporation *	John Pavlica, Jr
St. Pier Group LLC *	Scott Communications, Inc. *	
Southeastern Oklahoma Radio, LLC *	Alexander Broadcasting Co., LLC *	

*All filed under the "Joint Comments of AM Station Owners" prepared by Wiley Rein, LLP