

Rule changes that authorize minor changes to include any useable frequency (exactly like FM Broadcast licensees are allowed to do) without a change in the city of license should not take years to finalize, nor should the AM licensee have to wait for a general AM filing window to make Major changes to an existing facility. Major changes to an existing AM facility should be accepted when filed, not via a “filing window” which may occur only once-a-decade.

Additionally, removing the Class C restriction on Class D operation on non-local channels should be adopted as soon as practical. Removing this restriction would allow Class C stations to seek daytime operation on any channel available as higher operating daytime power than currently allowed on their local channel is usually available. This flexibility for Class C stations to operate as Class D stations (on a non-local channel) is the same flexibility that existing Class B (or even Class A) stations currently enjoy. It’s an exchange in facilities and does not create any “new” stations.

FM Translator Window for AM Licensees and Permittees

We support the opening of an exclusive AM only window as many of the comments do in this proceeding, but urge the Commission to consider that an Open-to-All FM translator window is a better choice. A preference would be given to AM stations to resolve MX issues should they occur. It has been more than 10 years (2003) since the last FM commercial translator widow was opened. This diminishing resource needs to be open to all applicants, not just the AM licensees/permittees.

Expanded AM Band (A Spectrum Waste)

We support the comments of others that suggest that the expanded AM Band should be open to all applicants. The expanded band should be rolled into the same allocation standards that are in use in the “Standard” AM Band and opened to all applicants with a preference given to NEW broadcast entrants and a secondary preference given to existing licensees moving from the standard band.

AM Synchronous Transmitters

We support the comments of all in support of the use and authorization of
AM Synchronous Boosters/Transmitters.

March 20, 2014

Respectfully Submitted,

A handwritten signature in blue ink that reads "Timothy Z. Sawyer". The signature is written in a cursive style with a large initial "T" and "S".

Timothy Z. Sawyer
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