

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20024

In the Matter of:)
)
Revitalization of the AM radio Service) MB Docket 13-249
)
)
)

REPLY COMMENTS
OF KEVIN M. FITZGERALD

Kevin M. Fitzgerald, (hereinafter “Fitzgerald”), Submits these Reply Comments to the Notice of Proposed Rulemaking regarding the Revitalization of the AM radio Service.

A/ Reply Comment to Comments filed by Clear Channel Communications, Inc.

Fitzgerald here supports the Comments filed by Clear Channel Communications (CCC) filed on January 21, 2014. Of particular note is support for the third paragraph of CCC's Comments regarding a special window for AM Licensee's to have a special application window to apply for FM translators. It has been clearly shown that FM translators have greatly helped AM stations. They drive audience back to the AM band and provide great interference free nighttime service to a portion of an AM station's coverage area. The FM Translators allocated in this window should be required to be kept with the applying AM station of note. Each AM station should be allowed one of these new FM translator allotments (if available). These new FM translator allotments should given to each applying AM station, regardless of whether an AM station already has an existing FM Translator. This would be an unfair penalty on AM stations who already went out and got FM translators.

CCC also suggests a change to the geographic limits for allowing use of an FM Translator. Fitzgerald supports the change CCC has suggested; The FM Translator's 60 dBu contour must fit within the GREATER of the 25 mile radius from the AM station's transmitter site or the AM station's 2 mV/m contour. This rule has been an issue with some higher band AM stations in areas with poor ground conductivity. Also, in rural areas of the West and Midwest some AM stations are quite far from their city's of license, the 25 mile limit severely precludes their use of FM translators over their primary city. In all fairness, a relaxation of this limit might be in order. Fitzgerald suggests that this number be raised to 35 miles. Thus the new rule would be: An FM Translator's 60 dBu contour must fit within the GREATER of a 35 mile radius from the AM station's transmitter site or the AM station's 2 mV/m contour.

CCC also suggests liberalizing the AM daytime community coverage minimums. This is an excellent idea and should be considered. Also suggested was elimination of the "ratchet rule". This is not relevant any longer and should be eliminated.

B/ Reply Comment to Comments filed by Mark D. Humphrey

Fitzgerald here supports the Comments filed by Mark D. Humphrey (MDH) filed on January 22, 2014. Of particular note is support for the section regarding "IF" distance separation requirements. MDH points out that newer receiver designs and improvements over the past 20 years have greatly changed the need for this rule. At the very least, FM translator stations and all FM stations broadcasting with 250 watts or less should be exempt from this requirement. At the very least, FM translators should be allowed to use the minimum spacing table in 73.213 (3kw Class A's) instead of the over restrictive table in 73.207 (6kw Class A's).

MDH also suggests using alternate interference calculation methodologies. This is a good idea as the Longley Rice methodology has already been shown to be highly reliable.

CONCLUSION

Many of the ideas brought up by the Commission and Organizations filing Comments to help Revitalize the AM band in MB Docket 13-249 are excellent ideas. These Reply Comments presented here are a highlight of support for some of the best ideas submitted.

Respectfully submitted,

Kevin M. Fitzgerald,
General Partner, Geos Communications;
Licensee of WGMF-AM, WZMF-AM, and
WAZL-AM
Director of Engineering, The Scranton
Times, L.P.; Licensee of WEJL-AM and
WBAX-AM
Technical Consultant, The Milwaukee
Radio Alliance; Licensee of WZTI-AM
P.O. Box 20155
Scranton, PA 18502
3/20/2014
607-427-0452