

June 23, 2013

**VIA ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W., TW-A325  
Washington, D.C. 20554

**Re: Summary of the Ex Parte Meetings with Commissioner Ajit Pai and his Chief  
of Staff Matthew Berry  
MB Docket Nos. 13-249; 07-294; 06-121; 02-277; 04-228  
MM Docket Nos. 01-235; 01-317; 00-244  
GN Docket No. 12-268 and FCC 07-217**

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Dear Ms. Dortch:

This letter is submitted pursuant to Section 1.1206 of the Commission's Rules to disclose the communications made in the above-referenced proceedings.

On June 19, 2014, Ben Downs, Vice President of Bryan Broadcasting Corporation, which controls the licensee of several radio stations in and around the Bryan/College Station Texas radio market; Oscar Rodriguez, President and CEO of the Texas Association of Broadcasters; and the undersigned met with Commissioner Ajit Pai and his Chief of Staff Matthew Berry to discuss the above-referenced proceedings.

Mr. Downs presented the following thoughts about the ideas being discussed in the AM improvement proceeding and suggestions for future actions in that proceeding. It was noted at the meeting that these ideas are those of Mr. Downs himself, and do not necessarily represent those of the Texas Association of Broadcasters or of any other company or organization. His comments and suggestions included the following:

- Mr. Downs related that he has corresponded or spoken with over 200 AM broadcasters about this proceeding, and there is almost universal belief that the use of FM translators for AM stations offers the best short-term way of economically stabilizing AM stations.

Marlene H. Dortch, Secretary

June 23, 2013

Page 2

- However, FM translators probably will not work in all markets, especially in many larger markets where the spectrum will be too congested to allow for new translators for many (and, in some markets, perhaps almost all) AM stations.
- Mr. Downs suggested that preferences in the award of FM translators in congested markets be given to Class D stations, and then be prioritized among other classes of AM stations to favor those with smaller service areas and limited nighttime power.
- He suggested that, if there is no spectrum for translators for all the AM stations in a market, licensees should be able to move translators into that market from surrounding areas, though he recognized that this would be of limited utility, as there will not be many situations where nearby translators will be able to be moved into congested markets.
- Mr. Downs suggested that there be some limits on interference complaints against new translators to make sure that the complaints are identifying real interference in areas where full-service stations are actually used by station listeners. He suggested that single, isolated complaints of interference far from a primary station's listening area be viewed skeptically.
- Mr. Downs suggested that FM translators used by AM stations, if they are in place for over two years with no complaints of interference, be accorded some sort of protection so that they are not preempted by changes in full-power stations after establishing a listening audience. One idea may be to allow an AM station to turn in its AM license, to lessen AM interference, in exchange for some sort of primary status for its translator operations.
- If displaced, translators should be allowed to use any open frequency as a displacement channel, not just an adjacent channel.
- AM stations without nighttime authorizations, or those with limited nighttime operations, should be allowed to sign-on with some level of useful power at a uniform time rather than having their operational hours change each month. Mr. Downs suggested that a 6 AM sign-on would provide many advantages for such stations.
- Skywave service should be studied by the FCC to see how much it is relied on by the public.
- Mr. Downs noted that there is an antenna system in use in Egypt, a "cross-field array," that causes little skywave interference and does not need an extensive ground system. He suggested that this type of antenna system needs to be tested in the US.

Marlene H. Dortch, Secretary

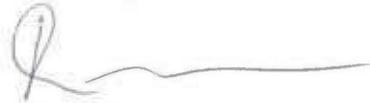
June 23, 2013

Page 3

- AM all-digital service is promising, but will require the abandonment of existing AM receivers. Mr. Downs suggested that a receiver mandate might be necessary to promote such a change to an all-digital operation.
- Mr. Downs suggested that VHF Channels 2 through 6 could make a new home for AM cross-band migrating stations, and urged the FCC to limit new uses in these channels in the repacking of the TV spectrum. He also noted that many FM receivers already have technology to receive radio signals on Channels 5 and 6 as they are used for FM service in Asia, though he does not believe cross-band migration should be limited to just these two low VHF channels.

Should there be any questions concerning this matter, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read 'David Oxenford', with a long horizontal flourish extending to the right.

David Oxenford

cc: Commissioner Ajit Pai  
Matthew Berry