In the Matter of Amendment of Section 73.207, 73.211, 73.215, and 73.3573 of the Commission's Rules related to Minimum Distance Separation Between Stations, Station Classes Power and Antenna Height Requirements, Contour Protection for Short Space FM Assignments, and Processing FM Broadcast Station Applications

Docket No. MB RM-11727

To: Marlene Dortch, Secretary
Federal Communications Commission
Attention: Media Bureau

COMMENTS OF PETITIONER

SSR Communications, Inc. ("Petitioner") hereby submits its Comments in the above-captioned proceeding. In its initial Petition for Rulemaking ("Petition," now designated as RM-11727), Petitioner has asked the Commission to consider two separate proposals. Specifically, Petitioner requests that the Commission (1) create a new FM "C4" power class that would permit Zone II FM operators to specify broadcast facilities of up to 12,000 Watts of effective radiated power from a reference antenna height above average terrain of 100 meters, and (2) create a "Show Cause Order" procedure that would allow sub-maximum class FM facilities not currently authorized under Section 73.215 of the Commission's Rules to be reclassified as 73.215 facilities under specific circumstances involving a competing demand for radio spectrum. Petitioner respectfully asserts that both proposals are in the public interest and represent a fair and efficient use of broadcast
spectrum. In conjunction with the two proposals, recognizing that Petitioner’s proposals could impact broadcasters utilizing fill-in FM translators, particularly fill-in FM translators serving as enhancements to AM service, Petitioner requests certain minor adjustments to the FM translator interference rules.

CREATION OF A CLASS "C4" ALLOCATION

Petitioner has asked the Commission to create a new, intermediate power class for FM stations located within Zone II, situated in between FM Class A and FM Class C3. The FM "C4" Allocation would permit a maximum effective radiated power level of 12,000-Watts from a reference antenna height above average terrain of 100 meters. The creation of the C4 class would provide a relationship uniformity of approximately 3.0 dB in power between each adjacent FM class, something which does not exist under the Commission’s current Rules.

In support of this proposal, Petitioner initially studied 1,236 Class A FM stations within several Zone II states and found that 376 of those stations (30.4%) may be eligible to upgrade to the new classification. Since its original filing, however, Petitioner commissioned an additional, more comprehensive study and found that approximately 781 Zone II Class A FM stations may be eligible to apply for a Class C4 allocation (see www.wyab.com/petition/maps). Petitioner also asked for the Commission to integrate new FM Class C4 spacing standards into its existing Section 73.207 separation tables to accommodate the new allocation, so Petitioner respectfully asserts that no interference will be caused to existing stations as a result of the creation of this new class.
The creation of a new station classification is hardly an unprecedented act, and has been achieved many times in the past. Section 303 of the Communications Act of 1934 (Revised in 1996) specifically calls for the Commission to classify radio stations by frequency and power levels. As part of the Commission’s 1998 Biennial Regulatory Review – Streamlining of Radio Technical Rules in Parts 73 and 74 of the Commission’s Rules (MM Docket No. 98-93), for instance, the Commission created an intermediate FM Class C0 power class, to be situated in between FM Class C1 and FM Class C, as the prior allocation scheme did not represent an efficient use of the FM spectrum, contrary to the mandates of the Communications Act of 1934 and was counter to the public interest.

In further reinforcement of this proposition, approximately one year after the filing of the petition considered herein, Petitioner organized a support drive in an attempt to measure interest for the creation of a new FM Class C4 allotment and revision of Section 73.215 of the Commission’s Rules (see www.wyab.com/petition/). In all, 143 broadcasters and licensees from 653 total stations co-signed a letter of support for Petitioner’s proposal, attached hereto as Exhibit A. Petitioner respectfully asserts that there is broad demand for both the creation of a new FM allocation, as well as revision of Section 73.215 of the Commission’s Rules (see below section).

73.215 CONFERENCE PROCEDURE

In its proposal, Petitioner seeks to create a procedure upon which a licensee or permittee of a non-reserved band FM facility may apply for a specific service area improvement against a neighboring co-channel or adjacent-channel facility that is not already authorized under Section 73.215 of the Commission’s Rules, by conferring
73.215 status upon the affected station, provided that: (1) a valid “triggering application”
has been filed seeking a specific service improvement using a portion of the same
spectrum, and (2) the affected station has been operating below the maximum effective
radiated power level and/or antenna height above average terrain (or equivalents thereof)
of its station class for the ten-year period preceding the filing of the triggering
application. Paralleling the Commission’s C0 reclassification procedures, the affected
station would have an opportunity to preserve its status by applying for full facilities to
the station’s respective class.

The Commission’s current rules allow for FM licensees and permittees to apply
for facilities that would otherwise violate Section 73.207’s minimum separation standards
by proposing short-spaced operations under Section 73.215. When an applicant seeking a
specific service improvement considers contour interference protection in opposition to
neighboring stations operating under 73.215 are protected based upon their actual
licensed or permitted facilities, but in many circumstances, stations that are not
authorized under Section 73.215 enjoy contour overprotection as if they were operating at
their hypothetical class maximums for antenna height and effective radiated power level.
In its original proposal, Petitioner asserts that this overprotection amounts to spectrum
warehousing and the policy prevents other stations proposing specific service
improvements from doing so.

During the creation of the FM C0 reclassification procedure of MM Docket 98-
93, the Commission addressed this very issue of contour overprotection (as it related to
overprotection of FM Class C facilities, at the time):
...We believe that reducing the “overprotection” of lesser facility Class C stations is a reasonable and appropriate means to recover valuable FM spectrum and thereby create opportunities for new and/or improved FM service [...] We believe that this tailored approach will enable broadcasters to bring more and better service to listeners without unnecessary disruption to existing Class C stations.

- MM-Docket 98-93 / Second Report And Order / FCC 00-368 / Paragraph 16

Additionally, the Commission stated that contour overprotection represents an inefficient use of spectrum:

The present overprotection of a majority of Class C stations constitutes an inefficient use of FM spectrum and is inconsistent with the technical assumptions underlying the Commission’s rules.

- MM-Docket 98-93 / Second Report And Order / FCC 00-368 / Paragraph 17

And:

Overprotection of Class C stations is inconsistent with those standards and constitutes an inefficient use of spectrum.

- MM-Docket 98-93 / Second Report And Order / FCC 00-368 / Paragraph 19

Finally, the Commission determined that a balance of interests would be reached by discontinuing overprotection for Class C FM facilities:

... Where there is a bona fide interest in such spectrum, however, we do not believe that the public interest is served by continued overprotection of stations that have failed to construct facilities in accordance with the expectations underlying their original Class C station assignments. Under these circumstances, reclassification would serve the public interest by recovering valuable FM spectrum.

- MM-Docket 98-93 / Second Report And Order / FCC 00-368 / Paragraph 25

The Commission’s argument for discontinuing overprotection to underbuilt FM Class C facilities mirrors the present situation precisely. In its conclusion, the Commission identified hundreds of Class C authorizations that were operating below their class maximums with respect to antenna height above average terrain and power level, thus preventing adjacent stations from realizing specific service improvements and thereby wasting valuable spectrum. The Commission decided that further contour overprotection would not persist, provided that there was a specific bona-fide expression of interest or upgrade proposal for the same spectrum that could not be accomplished
without a C0 reclassification to the overprotected station. Today, however, there are hundreds of stations within all classes of FM service not licensed under Section 73.215 that have been unwilling or unable to construct full facilities, yet have enjoyed contour overprotection (in some cases, for many decades) as if they had operated at their class maximums since their sign-on date. This contour overprotection amounts to spectrum warehousing, precludes other stations from realizing specific service improvements, is an inefficient use of FM spectrum, and is contrary to the public interest.

As part of its proposal, Petitioner suggested that non-73.215 stations that had failed to construct full facilities within the preceding ten year period of the filing of a valid “triggering application” would be assumed to have little interest in or ability to build out fully to their class maximum antenna height above average terrain and effective radiated power level (or the equivalent thereof). Nonetheless, precisely aligning with the Commission’s C0 reclassification procedure of MM Docket No. 98-93, Petitioner believes that affected stations facing a 73.215 reclassification be given ample opportunity to construct full facilities. Petitioner proposed that the exact same procedure for FM Class C0 reclassification apply to the conference of a 73.215 designation upon affected stations. That is to say, upon the filing of a valid triggering application, the affected station would be afforded 30 days to respond to the Commission’s issuance of an Order to Show Cause to said station as to why it should not accept Section 73.215 status. If the affected station elects to construct full facilities, then the licensee will be given an additional 180-day window in which to file an acceptable construction permit application calling for class maximum facilities (or the equivalent thereof), with the triggering application to be dismissed upon grant of the affected station’s application. Petitioner
asserts that this procedure respects the Commission’s prior policies regarding contour overprotection, and would preserve a balance of interests between stations seeking to improve their service areas and existing facilities.

Petitioner also believes that contour overprotection is contrary to the Communications Act of 1934 (revised in 1996). The very first sentence of Section 301, which addresses the creation of the Federal Communications Commission and its duties to license radio spectrum, plainly addresses this issue:

It is the purpose of this chapter, among other things, to maintain the control of the United States over all the channels of radio transmission; and to provide for the use of such channels, but not the ownership thereof, by persons for limited periods of time, under licenses granted by Federal authority, and no such license shall be construed to create any right, beyond the terms, conditions, and periods of the license.

- Communications Act of 1934 (Revised, 1996) / Section 301 / Paragraph 1 (emphasis added)

The Commission’s current contour overprotection policies call for certain facilities to be given additional spectrum rights beyond their licensed antenna height and effective radiated power level. Petitioner believes that this overprotection precisely represents a “right beyond the terms, conditions, and periods of the license,” which is directly contrary to the Communications Act of 1934 and in opposition to the public interest.

**TRANSLATOR CONSIDERATIONS**

Although Petitioner did not initially request rule changes involving FM translator stations, Petitioner recognizes that fill-in FM translator service will likely be a key component of the Commission’s ongoing AM Revitalization Notice of Proposed Rulemaking, MB Docket No. 13-249, FCC 13-139, released October 31, 2013. It is appropriate to note that Petitioner itself has no FM translator holdings but is concerned
that its proposal could impact those broadcasters utilizing fill-in FM translators and the audiences for those fill-in FM translators.

In the past several years the scope and function of translator use to augment and enhance fill-in service from broadcast stations to communities, both from more consistent and reliable AM service, and from diverse HD sub-channel programming unavailable to analog radio listeners, has grown tremendously. It is not the intent of Petitioner to harm in any way through its proposals this nascent enrichment of AM service and the provision of diverse programming. Rather, Petitioner respectfully believes that the Commission should, at the same time as it enhances the prospects of Class A stations for service improvements, adopt rule adjustments for fill-in FM translator service. Both are situations deserving of Commission attention. Reliability of service for fill-in FM translators benefit communities and listening audiences in the same way as will the proposed enhancements to Class A stations.

Section 301 of the Communications Act of 1934, in addition to supporting enhancements for Class A stations, likewise supports safeguards to fill-in FM translator service from the out-of-contour overprotection of FM facilities. Although Petitioner fully recognizes and accepts that translators represent a secondary service, Petitioner believes that allowing full power FM stations to claim interference from translators beyond their protected service contours constitutes an example of a licensee enjoying a right beyond the terms, conditions, and periods of its license, which is clearly contrary to Section 301 of the Communications Act of 1934. Petitioner does not dispute the fact that radio listening occurs beyond a station’s protected contour, and the Commission has upheld this notion many times in the past. Petitioner does respectfully maintain, however, that a
station’s license does not specifically confer a right to serve listeners beyond its protected contour.

In consideration of the above, Petitioner respectfully asks that the Commission only consider fill-in FM translator interference claims of a full power FM facility within its protected service contour, and only during the first year of the subject fill-in translator’s operation.

Section 74.1203(a) of the Commission’s rules currently provides broad protections for a full-service station outside of its protected contour, stating that:

(a) An authorized FM translator or booster station will not be permitted to continue to operate if it causes any actual interference to:

(1) The transmission of any authorized broadcast station; or

(2) The reception of the input signal of any TV translator, TV booster, FM translator or FM booster station; or

(3) The direct reception by the public of the off-the-air signals of any authorized broadcast station including TV Channel 6 stations, Class D (secondary) noncommercial educational FM stations, and previously authorized and operating FM translators and FM booster stations. Interference will be considered to occur whenever reception of a regularly used signal is impaired by the signals radiated by the FM translator or booster station, regardless of the quality of such reception, the strength of the signal so used, or the channel on which the protected signal is transmitted.

Section 74.1203(a) currently provides no limit as to where interference from an FM translator may be claimed to occur by a full-service station. A full-power FM facility is able to allege interference from a distant translator station, even if such interference
occurs well beyond its protected contour. In some cases, full power FM licensees citing
the above provision of the Commission’s rules have been able to make dubious
interference claims in an attempt to force a neighboring translator station to either change
its frequency, or worse, cancel its authorization altogether.

Petitioner respectfully asks the Commission to amend Section 74.1203(a) to only
consider fill-in FM translator interference claims from a broadcast station within the
broadcast station’s protected service contour, and only during the first year of the subject
translator’s operation, and to align the rules for fill-in FM translators and new or
modified full service station applications more closely with the similar rules existing for
LPFM stations.

Petitioner requests an amendment to Section 74.1203(a) of the rules so that it
states (changed text underlined):

(a) An authorized FM translator operating outside of its
primary station’s fill-in area or booster station will not be
permitted to continue to operate if it causes any actual
interference to:

(1) The transmission of any authorized broadcast
station; or

(2) The reception of the input signal of any TV
translator, TV booster, FM translator or FM booster
station; or

(3) The direct reception by the public of the off-the-
air signals of any authorized broadcast station
including TV Channel 6 stations, Class D
(secondary) noncommercial educational FM
stations, and previously authorized and operating
FM translators and FM booster stations.

Interference will be considered to occur whenever
reception of a regularly used signal is impaired by
the signals radiated by the FM translator or booster
station, regardless of the quality of such reception,
the strength of the signal so used, or the channel on which the protected signal is transmitted.

An authorized FM translator operating inside of its primary station’s fill-in area will not be permitted to continue to operate if it causes any actual interference within its first year of operations with its current facilities to:

(4) The transmission of any previously authorized broadcast station inside its protected contour, or

(5) The reception of the input signal of any TV translator, TV booster, FM translator or FM booster station, or

(6) The direct reception by the public of the off-the-air signals inside the protected contour of any previously authorized broadcast station with interference considered to occur whenever reception of a regularly used signal is impaired by the signals radiated by the FM translator station.

If a full service FM facility application is filed subsequent to the filing of an FM translator station facility application, such full service station is protected against any condition of interference to the direct reception of its signal caused by such FM translator station that operates on the same channel, first-adjacent channel or intermediate frequency (IF) channel as or to such full service station, provided that the interference is predicted to occur and actually occurs within:

(7) The 3.16 mV/m (70 dBu) contour of such full service station, or

(8) The community of license of such full service station; or

(9) Any area of the community of license of such full service station that is predicted to receive at least a 1 mV/m (60 dBu) signal. Predicted interference shall be calculated in accordance with the ratios set forth in § 73.215 paragraphs (a)(1) and (a)(2). Intermediate frequency (IF) channel interference overlap will be determined based upon overlap of the 91 dBu F(50,50) contours of the FM
and translator stations. Actual interference will be considered to occur whenever reception of a regularly used signal of such full service station is impaired by the signal radiated by the FM translator station.

Under these proposed revised rules, a fill-in FM translator after its first year of operations could no longer be subject to interference complaints from an existing full-service FM station. After the first year of operations with current facilities, there would be a stability and reliability of operations to fill-in FM translators. Until one year of operations had elapsed, the fill-in FM translator would be “at-risk”.

The secondary status of fill-in FM translators with respect to full service FM stations is maintained as to any new or modified full service FM station applications, such as Class C4 applications, with the FM translator interference rules for fill-in FM translators being more closely aligned with those rules already existing for LPFM interference (See Section 73.809(a) of the Commission’s rules). Such interference safeguards are already well-tested in the LPFM arena, and aligning the safeguards for fill-in FM translators with those in place for LPFM stations make sense.

Further, recognizing the importance of fill-in FM translator service, if a fill-in FM translator is displaced or asked to change facilities due to allegations of, or the prospect of, interference covered by the amended Section 74.1203(a), Petitioner proposes that that the Commission specifically allow the translator to move to any other eligible frequency, without the need for a “major change” application waiver request, by adding the following as subsection (f) to Section 74.1203 of the Commission’s rules:

(f) An authorized fill-in FM translator that may be required to modify its facilities or cease operations pursuant to Section 74.1203(a) shall be afforded the opportunity to seek a continuance of operations by specifying any
available FM frequency and such application shall be regarded as a minor change pursuant to Sections 74.1233(a)(1) & (2).

Given the importance of consistent and reliable AM service and diverse HD sub-channel programming unavailable to analog radio listeners from fill-in FM translators, the adoption of the above safeguards for the fill-in FM translator service is respectfully requested in this proceeding.

CONCLUSION

Petitioner respectfully requests that the Commission fully consider its proposal, as it will enable many FM broadcast facilities to significantly improve their service areas without impacting the actual service areas of other stations. Petitioner's proposal will promote fair and efficient use of the FM broadcast spectrum, and many millions of listeners will receive improved FM service. Additionally, even though Petitioner has no translator holdings, Petitioner believes that the adoption of corollary safeguards for fill-in FM translators will protect both the listening public, and protect broadcasters providing AM service and diverse programming through FM translators, from potential adverse impacts.
Petitioner respectfully believes that Section 73.215 of the Commissions Rules (as well as the other changes proposed herein) is in need of amendment and asks that a Notice of Proposed Rulemaking be issued in this proceeding without delay.

Respectfully submitted,

[Signature]
Matthew K. Wesołowski
Chief Executive Officer
SSR Communications, Inc.
740 U.S. Highway 49 North
Suite R
Flora, MS 39071
(601) 201-2789, matt@wyab.com

[Signature]
John F. Garziglia
Womble Carlyle Sandridge & Rice, LLP
1200 19th Street, N.W. Suite 500
Washington, DC 20036
(202) 857-4455, jgarziglia@wcsr.com
(Representing the licensees of numerous full-service FM broadcast stations and FM translators)

August 7, 2014
Dear Commissioners of the Federal Communications Commission and Media Bureau Staff:

I support the petition for rulemaking filed by SSR Communications, Inc., on Friday, January 18, 2013 (received Tuesday, January 22, 2013), requesting certain engineering changes pertaining to commercial FM broadcast standards, including the creation of a new FM 'Class C4' allocation and amendments of Sections 73.207, 73.210, 73.211, 73.215, and 73.3573 of the Commission's Rules.

I believe that, as hundreds of Zone II commercial FM stations would be able to apply for upgraded facilities without impacting the service areas of existing stations, SSR's proposal is clearly in the interest of the public.

In the event that the Commission announces a comment window and formal Notice of Proposed Rulemaking ('NPRM') for SSR's petition for rulemaking, then I intend to file comments in favor.

Sincerely,

Name: Matthew Wesolowski
Organization: WYAB 103.9 FM
Title: CEO / General Manager
Date: 4/16/2014
Additional Comments: This proposal could affect hundreds (if not thousands) of Class A radio stations in a positive way. Please act right away.

Name: Johnny Boswell
Organization: Boswell Media
Title: owner
Date: 4/16/2014
Additional Comments: I think the engineering logic for this rule making is quite sound.

Name: Philip Lizotte
Organization: Broadcast Partners, Inc
Title: President
Date: 4/16/2014
Additional Comments:

Name: Damon Collins
Organization: Blackbelt Broadcasting Inc.
Title: President
Date: 4/16/2014
Additional Comments: Station WLYB-FM Livingston Alabama

Name: Jamie Turner
Organization: Ozark Media
Title: Operations Manager
Date: 4/16/2014
Additional Comments: 2 of our facilities are short spaced with only 3kw. We would love the opportunity to upgrade.
Name: Mark Heller  
Organization: Metro North Communications, Inc  
Title: President and Owner  
Date: 4/16/2014  
Additional Comments: It's time to consider this Class of station, especially supporting minority broadcasters, as mentioned by MMTC in the original filing.

Name: Carl Haynes  
Organization: WRTM-FM  
Title: President  
Date: 4/16/2014  
Additional Comments:

Name: Michael St John  
Organization: FUN Media Group Inc  
Title: Owner / President  
Date: 4/16/2014  
Additional Comments:

Name: Mark Layne  
Organization: Ville Platte Broadcasting  
Title: General Manager  
Date: 4/16/2014  
Additional Comments: I totally support this proposal and ask for your consideration to help small market stations like ours.

Name: Larry Fuss  
Organization: Delta Radio LLC  
Title: President  
Date: 4/16/2014  
Additional Comments:

Name: James E. Martin  
Organization: Flagler Broadcasting  
Title: President WAKX  
Date: 4/17/2014  
Additional Comments: This would enable us to serve many more people.

Name: Robert J. Kern  
Organization: TLP Communications, Inc.  
Title: President  
Date: 4/17/2014  
Additional Comments: This proposal makes good sense for smaller stations and the public they serve.

Name: Greg Shapiro  
Organization: RF Services Inc.  
Title: Treasurer  
Date: 4/17/2014  
Additional Comments: We also feel the 'fully spaced allotment site' rules need changes as well.

Name: Robert E Williams  
Organization: Alatron Corporation  
Title: President  
Date: 4/17/2014  
Additional Comments:

Name: Mark Porter  
Organization: Globecom Media  
Title: President  
Date: 4/18/2014  
Additional Comments: If you want to "re-vitalize" local radio. This is the way to do it!
<table>
<thead>
<tr>
<th>Name</th>
<th>Organization</th>
<th>Title</th>
<th>Date</th>
<th>Additional Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Casey McIntosh</td>
<td>KCMD-FM</td>
<td>Owner</td>
<td>4/18/2014</td>
<td></td>
</tr>
<tr>
<td>Robert Sullins</td>
<td>Keystone Broadcasting Corporation</td>
<td>President</td>
<td>4/18/2014</td>
<td>this would greatly benefit the radio industry</td>
</tr>
<tr>
<td>Juan Carlos Matos</td>
<td>New Life Broadcasting, Inc.</td>
<td>President/Owner WNVM-FM</td>
<td>4/18/2014</td>
<td>I support this petition and request the FCC to create an equivalent class for Puerto Rico and Virgin Island</td>
</tr>
<tr>
<td>Paul Saunders</td>
<td>KREV-LP</td>
<td>General Manager</td>
<td>4/18/2014</td>
<td>The ability to gain population without interference is a worthy goal however so slight.</td>
</tr>
<tr>
<td>R.C. Amer</td>
<td>Vision Communications, Inc.</td>
<td>President</td>
<td>4/18/2014</td>
<td>We would be very much in favor of this action</td>
</tr>
<tr>
<td>Joseph Episcopo</td>
<td>KEPL-FM CP</td>
<td>Owner</td>
<td>4/18/2014</td>
<td></td>
</tr>
<tr>
<td>Ron Stone</td>
<td>Adams Radio Group</td>
<td>CEO</td>
<td>4/21/2014</td>
<td></td>
</tr>
<tr>
<td>Randolph Bell</td>
<td>Southern Wabash Communications Corporation</td>
<td>President</td>
<td>4/21/2014</td>
<td></td>
</tr>
<tr>
<td>Michelle Hulse</td>
<td>WSJD, Inc.</td>
<td>President</td>
<td>4/21/2014</td>
<td></td>
</tr>
<tr>
<td>Terry Barber</td>
<td>Bluewater Broadcasting, CO LLC</td>
<td>Vice President</td>
<td>4/21/2014</td>
<td></td>
</tr>
</tbody>
</table>
Name: Dennis Jones  
Organization: RadioJones, LLC  
Title: President  
Date: 4/22/2014  
Additional Comments: Thanks.

Name: Bob Simmons  
Organization: Simmons Multimedia  
Title: President/CEO  
Date: 4/22/2014  
Additional Comments:

Name: John Roberts  
Organization: East Kentucky Broadcasting  
Title: Director of Sales  
Date: 4/22/2014  
Additional Comments:

Name: Kenneth R. Rainey  
Organization: Rainey Broadcasting Inc.  
Title: President  
Date: 4/22/2014  
Additional Comments: I would ask that the FCC please consider the above SSR proposal.

Name: Mark Jones  
Organization: Lendsi Radio, LLC  
Title: Owner/GM  
Date: 4/23/2014  
Additional Comments:

Name: Steven T. Moravec  
Organization: Phoenix Media Group, Inc.  
Title: President  
Date: 4/23/2014  
Additional Comments:

Name: J Storey  
Organization: Media One  
Title: VP  
Date: 4/24/2014  
Additional Comments:

Name: Doug Stannard  
Organization: KUMX-FM  
Title: GM/Owner  
Date: 4/24/2014  
Additional Comments:

Name: Alan Taylor  
Organization: West Central Broadcasting Co., Inc.  
Title: Owner  
Date: 4/24/2014  
Additional Comments:

Name: Ed Taylor  
Organization: Calvary Chapel Aurora  
Title: President  
Date: 4/24/2014  
Additional Comments:

Name: Art Sutton  
Organization: Georgia-Carolina Radiocasting
Title: President/CEO  
Date: 4/24/2014  
Additional Comments:

Name: Ken Noble  
Organization: Radio & Investments, Inc.  
Title: Pres.  
Date: 4/24/2014  
Additional Comments: Licensee of KDDK 105.5 FM

Name: Joseph C. Thomas  
Organization: WYAD-LP - 94.1 FM - Bountiful Blessings Broadcasting  
Title: Officer  
Date: 4/25/2014  
Additional Comments:

Name: Edward Saint Pe'  
Organization: WeatherVision, Inc, WLEZ-LP  
Title: President  
Date: 4/25/2014  
Additional Comments: I support this petition for rulemaking.

Name: Paul Ploener  
Organization: Ploener Radio Group  
Title: President  
Date: 4/25/2014  
Additional Comments:

Name: Alex Berger  
Organization: Alex Media Inc  
Title: President  
Date: 4/25/2014  
Additional Comments:

Name: Ken Diebel  
Organization: KGGM 93.5 FM  
Title: Licensee  
Date: 4/28/2014  
Additional Comments: I support this proposal and ask that the FCC act quickly.

Name: Louis Coco  
Organization: Cajun Broadcasting Inc  
Title: President  
Date: 4/28/2014  
Additional Comments: This proposal could help many small broadcasters.

Name: Harold Kneller  
Organization: Heartland Broadcasting Corp  
Title: President  
Date: 4/29/2014  
Additional Comments:

Name: Jeff Haislip  
Organization: WJIM AM/FM  
Title: Production Manager  
Date: 4/29/2014  
Additional Comments: This upgrade would really help us generate more revenue for our radio station.

Name: Linda Russin  
Organization: WIIS FM  
Title: Owner
<table>
<thead>
<tr>
<th>Name</th>
<th>Organization</th>
<th>Title</th>
<th>Date</th>
<th>Additional Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jerry Lousteau</td>
<td>WMGO</td>
<td>GM/Owner</td>
<td>4/29/2014</td>
<td>Great idea, let's do it.</td>
</tr>
<tr>
<td>Noah Britt</td>
<td>WPMO &amp; WVGG</td>
<td>President / GM</td>
<td>4/29/2014</td>
<td></td>
</tr>
<tr>
<td>Doug Amacker</td>
<td>WHJT</td>
<td>General Manager</td>
<td>4/29/2014</td>
<td></td>
</tr>
<tr>
<td>Meyer Gottesman</td>
<td>Rehoboth Beach Communications, Inc.</td>
<td>President</td>
<td>4/30/2014</td>
<td></td>
</tr>
<tr>
<td>William B. Cox III</td>
<td>Durlyn Broadcasting</td>
<td>President</td>
<td>4/30/2014</td>
<td></td>
</tr>
<tr>
<td>Ray Bilbrey</td>
<td>WLYU-FM</td>
<td>President</td>
<td>5/1/2014</td>
<td></td>
</tr>
<tr>
<td>Bill Coleman</td>
<td>Team Radio</td>
<td>Owner</td>
<td>5/1/2014</td>
<td></td>
</tr>
<tr>
<td>James McDermott</td>
<td>Lake Area Educational Broadcasting Foundation</td>
<td>President &amp; CE</td>
<td>5/1/2014</td>
<td>This is a very common sense proposal that would allow for the upgrade of certain facilities without increasing interference. I urge the Commission to issue a formal NPRM.</td>
</tr>
<tr>
<td>Jerry Williams</td>
<td>JWBP Broadcasting LLC</td>
<td>President/GM</td>
<td>5/1/2014</td>
<td>I own KMXH in Alexandria, La. I would be great for my station.</td>
</tr>
<tr>
<td>Tommy McDaniel</td>
<td>Sunbelt Broadcasting</td>
<td>President</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Date: 5/1/2014
Additional Comments: WJDR could benefit. Please act.

Name: Paul Wilson
Organization: LL James Media LLC
Title: owner
Date: 5/1/2014
Additional Comments:

Name: Thomas Walker
Organization: Mid-West Family
Title: President
Date: 5/2/2014
Additional Comments:

Name: Denny Benne
Organization: Benne Broadcasting
Title: Owner/GM
Date: 5/2/2014
Additional Comments:

Name: Terry E. Wood
Organization: Wood Broadcasting Co. Inc.
Title: Owner / President
Date: 5/2/2014
Additional Comments: This new class will greatly help small FM stations.

Name: Gerald D Cole
Organization: KCCU / Cameron University
Title: Director of Broadcasting
Date: 5/2/2014
Additional Comments:

Name: Dennis Burton
Organization: One Ten Broadcast Group KSLE FM
Title: General Manager
Date: 5/2/2014
Additional Comments:

Name: Gary Harrison
Organization: Piedmont Communications, Inc.
Title: President
Date: 5/2/2014
Additional Comments:

Name: Hays McMakin
Organization: Gateway Radio Works
Title: Pres. / Owner
Date: 5/4/2014
Additional Comments:

Name: Bill Countryman
Organization: Keystone Broadcasting
Title: General Manager, VP
Date: 5/5/2014
Additional Comments:

Name: Lee Anderson
Organization: Southeastern Oklahoma Radio LLC
Title: Owner/General Manager
Date: 5/5/2014
Additional Comments:
Name: Margaret Perkins  
Organization: First Natchez Radio Group  
Title: President/CEO  
Date: 5/6/2014  
Additional Comments:

Name: John Eves  
Organization: WXHC-FM  
Title: Owner  
Date: 5/6/2014  
Additional Comments: It would really help small family station like me.

Name: T J Bordelon  
Organization: Opus Broadcasting  
Title: Director of Engineering  
Date: 5/7/2014  
Additional Comments: I do support this change

Name: Ronald E. Geiger  
Organization: Haddox Ent.inc./dba WFFF FM/AM  
Title: President  
Date: 5/7/2014  
Additional Comments:

Name: Art Morris  
Organization: Broadcast Tech Services  
Title: Owner  
Date: 5/7/2014  
Additional Comments: I support the creation of class C4 stations in Zone II

Name: Christopher Miller  
Organization: Rocking M Radio, Inc.  
Title: Vice President  
Date: 5/7/2014  
Additional Comments:

Name: R. Lee Hagan  
Organization: Gulf Coast Broadcasting Co. Inc.  
Title: President  
Date: 5/7/2014  
Additional Comments: This will dramatically improve the health of small market broadcasting.

Name: Raymond Simes  
Organization: KAKJ / WNEV / KCLT  
Title: General Manager  
Date: 5/7/2014  
Additional Comments: I would like to see this happen as soon as possible.

Name: Todd Mohr  
Organization: Synergy Broadcast Group  
Title: President  
Date: 5/7/2014  
Additional Comments:

Name: Greg Slotsky  
Organization: Century Broadcasting  
Title: General Manager  
Date: 5/8/2014  
Additional Comments: This petition would really help WOHT 92.3 FM in Grenada, MS.
Name: Merv Lawson
Organization: Morgan Co Industries Inc
Title: GM
Date: 5/8/2014
Additional Comments:

Name: Clifford Smith II
Organization: Morgan Co Industries Inc
Title: Owner
Date: 5/8/2014
Additional Comments:

Name: Jason T. Plunk
Organization: Taylor Communications (WOXD)
Title: Owner
Date: 5/8/2014
Additional Comments:

Name: Chris Grams
Organization: Little Falls Radio Corporation
Title: General Manager
Date: 5/8/2014
Additional Comments:

Name: Helena Manzione
Organization: Watermark Communications, LLC
Title: GM
Date: 5/8/2014
Additional Comments:

Name: Brett Paradis
Organization: Paradis Broadcasting of Alexandria Inc.
Title: Pres/GM
Date: 5/8/2014
Additional Comments:

Name: Marc Scott
Organization: Arkansas Valley Valley Broadcasting, LLC
Title: President
Date: 5/8/2014
Additional Comments: KSBV and KAYV are in support.

Name: William Wolfenbarger
Organization: Jodesha Broadcasting, Inc
Title: President
Date: 5/9/2014
Additional Comments:

Name: Lorenzo L. Heard
Organization: WZBN 105.5
Title: CEO
Date: 5/9/2014
Additional Comments:

Name: Jon Thompson
Organization: Coast Broadcasting KCST & KCFM
Title: Owner/GM
Date: 5/9/2014
Additional Comments:

Name: Allan Weiner
Organization: WBCQ-FM
Title: owner  
Date: 5/9/2014  
Additional Comments: 

Name: Bruce James  
Organization: Vermont Broadcast Associates, Inc  
Title: President  
Date: 5/10/2014  
Additional Comments: In the rural and mountainous terrain we broadcast in, an increase in power would help get storm messages out to those who are shadowed at this time.

Name: Del Reynolds  
Organization: WCKC-FM  
Title: Owner  
Date: 5/10/2014  
Additional Comments: In this tough economic environment, any help we can get to improve our coverage will help with increased revenue that will allow us to hire more staff and create jobs.

Name: Bruce McKirdy  
Organization: Paradis Broadcasting  
Title: Vice President  
Date: 5/10/2014  
Additional Comments: In smaller rural communities like ours, the ability to reach more listeners with severe weather information is important. We hope you'll approve the changes suggested.

Name: Jeff Fuller  
Organization: J&J Radio Corp.  
Title: General Manager  
Date: 5/12/2014  
Additional Comments:

Name: Doug Bennett  
Organization: Doug Bennett Media  
Title: Owner  
Date: 5/12/2014  
Additional Comments:

Name: R John Taylor  
Organization: Pacific Empire Radio Corporation  
Title: Chairman of Board  
Date: 5/12/2014  
Additional Comments:

Name: Dylan Benefield  
Organization: Blue Sky Broadcasting  
Title: GM  
Date: 5/12/2014  
Additional Comments: I have 2 stations KICR-Coeur d Alene and KIBR-Sandpoint that would both benfit from this proposed rulemaking and would give these stations even more ability to serve their local communities.

Name: Larry Shirley  
Organization: WRBE FM  
Title: Owner  
Date: 5/12/2014  
Additional Comments: This would great benefit our coverage in the Greene County area. It's an area without a local radio station

Name: Calvin Butler  
Organization: WTYJ / WMIS  
Title: Operations Manager  
Date: 5/13/2014  
Additional Comments:
Name: Elliott Salmon
Organization: Icicle Broadcasting
Title: GM
Date: 5/13/2014
Additional Comments:

Name: JJ Kidder
Organization: Batesville Broadcast Corporation
Title: President
Date: 5/13/2014
Additional Comments: This is vitally important to small market broadcasters. Thank you for consideration.

Name: Dade Moore
Organization: New Wavo Com. KVST FM
Title: CE/PD
Date: 5/13/2014
Additional Comments:

Name: Tom Read
Organization: KSPO
Title: Licensee
Date: 5/13/2014
Additional Comments: KSPO airs more locally produced programs than all other market stations combined.

Name: Rogers Brandon
Organization: American General Media
Title: President
Date: 5/13/2014
Additional Comments:

Name: Leroy Billy
Organization: KPRV-FM Coleman Broadcasting
Title: Owner
Date: 5/13/2014
Additional Comments: Certainly would make a difference among the dozens of signals in our area.

Name: James Arata
Organization: Threshold Communications
Title: General Partner
Date: 5/13/2014
Additional Comments: We have co-channel B-1’s to north and south of our Class A, this would help us serve our market.

Name: Jeff Davis
Organization: Imperial Broadcasting Company
Title: Managing Director
Date: 5/14/2014
Additional Comments:

Name: Randall Christy
Organization: South Central Oklahoma Christian Broadcasting
Title: President
Date: 5/14/2014
Additional Comments:

Name: Jon Yinger
Organization: Christian Broadcasting System, LTD
Title: President and CEO
Date: 5/14/2014
Additional Comments:
Name: John Caracciolo
Organization: JVC Media LLC
Title: President/CEO
Date: 5/15/2014
Additional Comments: This is a much needed increase for smaller stations that are trying to survive.

Name: Howard Soule
Organization: Zone Corporation
Title: Director of Engineering
Date: 5/15/2014
Additional Comments:

Name: Gerry Schlenker
Organization: KCFS, University of Sioux Falls
Title: General Manager, Student Adviser
Date: 5/15/2014
Additional Comments:

Name: Shirley M. Bell
Organization: KRRM 94.7 FM
Title: Owner
Date: 5/15/2014
Additional Comments: This change would be beneficial for our listeners.

Name: Marcos Rodriguez
Organization: KUUR Carbondale Aspen
Title: CEO
Date: 5/16/2014
Additional Comments:

Name: Paula Marx
Organization: KBON 101.1 FM
Title: General Manager
Date: 5/19/2014
Additional Comments: This will help local radio grow.

Name: Paul Tinkle
Organization: Thunderbolt Broadcasting
Title: President
Date: 5/19/2014
Additional Comments: This will help serve local radio.

Name: Bud Walters
Organization: Cromwell Group, Inc.
Title: President
Date: 5/19/2014
Additional Comments: Translators have to be considered.

Name: David Mance
Organization: Border International Broadcasting Inc.
Title: President
Date: 5/20/2014
Additional Comments: WLYK, Cape Vincent, NY

Name: Gene Wisniewski
Organization: World Radio Link
Title: Consulting Engineer
Date: 5/25/2014
Additional Comments:

Name: Hundley Batts
Organization: Broadcast One, Inc
Name: John VanDenburgh  
Organization: Pamal Broadcasting Ltd.  
Title: Secretary Treasurer  
Date: 5/27/2014  
Additional Comments:

Name: Ed Stanford  
Organization: Stanford Communications Inc.  
Title: Owner  
Date: 5/28/2014  
Additional Comments:

Name: Lynn Farris  
Organization: Farris Broadcasting, Inc.  
Title: President  
Date: 5/28/2014  
Additional Comments:

Name: William Flack  
Organization: The Flack Broadcasting Group LLC  
Title: Managing Members  
Date: 5/29/2014  
Additional Comments: It would be much needed in my small market and would benefit greatly.

Name: Israel Tellez  
Organization: La Nueva Cadena Radio Luz Inc  
Title: President  
Date: 6/3/2014  
Additional Comments: In total agreement with proposal

Name: Jerry Tibbetts  
Organization: Triple t plus two inc.  
Title: Owner  
Date: 6/5/2014  
Additional Comments:

Name: Alan L. Button  
Organization: Woolstone Corporation / Pinestone Media  
Title: President  
Date: 6/5/2014  
Additional Comments: WLQC - Sharpsburg, NC and WLHC - Robbins, NC. We often hear from listeners disappointed by the effects of our power limits.

Name: Fred R Morton, CSRE  
Organization: Falls Media, LLC  
Title: Member  
Date: 6/6/2014  
Additional Comments: We own KXXN, a class A at Iowa Park, Texas. It would most certainly benefit from a power increase to 12 kw.

Name: Chuck Wood  
Organization: Delta Media Corporation  
Title: General Manager  
Date: 6/6/2014  
Additional Comments:

Name: G. Keating  
Organization: Retired Broadcaster
Title: A proposed C4 class to upgrade improved Class A FMs would finally benefit the plethora of long-suffering second class FM facilities lacking the "reach" to compete in many metro/suburban areas.

Name: Kenneth Ripley
Organization: Fort Stockton Radio Co., Inc.
Title: President
Date: 6/7/2014
Additional Comments:

Name: Lyndell Grubbs
Organization: Radio Ranch, LLC
Title: President & Owner
Date: 6/10/2014
Additional Comments: I fully support and encourage the Commission to allow Class A's the ability to better serve their communities with stronger and larger coverage.

Name: Larry Mariner
Organization: Forum Broadcasting
Title: President
Date: 6/10/2014
Additional Comments:

Name: Leonard Oswald
Organization: La Promesa Foundation / KYRT 97.9 FM
Title: President
Date: 6/10/2014
Additional Comments: We are in full support of the new station class.

Name: Robert Prasil
Organization: IdaVend Broadcasting, KRPL, Inc.
Title: Owner/President
Date: 6/12/2014
Additional Comments: I also believe that the increased power and reach would serve the public and the advertising base.

Name: Gerald Benavides
Organization: Claro Com.
Title: President
Date: 6/13/2014
Additional Comments: it will help and reach home & business

Name: Tom Gebhart
Organization: KAXA 103.7 Mountain Home, TX
Title: Owner/GM
Date: 6/19/2014
Additional Comments:

Name: Alejandro Cruz
Organization: Voz y Vision Ministries
Title: President
Date: 7/2/2014
Additional Comments:

Name: Gene Kirby
Organization: WRPO-LP
Title: G/Mgr
Date: 7/3/2014
Additional Comments:
<table>
<thead>
<tr>
<th>Name</th>
<th>Organization</th>
<th>Title</th>
<th>Date</th>
<th>Additional Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Michael Ferguson</td>
<td>Mountain Sites Comm.</td>
<td>Owner</td>
<td>7/3/2014</td>
<td></td>
</tr>
<tr>
<td>Gary G Weber</td>
<td>Winnstar, Inc</td>
<td>CEO</td>
<td>7/10/2014</td>
<td>There are plenty of business reasons for this class to be created. Especially in smaller markets like Little Falls, Minnesota (a great example).</td>
</tr>
<tr>
<td>John Higgs</td>
<td>Broadcast South</td>
<td>President</td>
<td>7/21/2014</td>
<td></td>
</tr>
<tr>
<td>Ron Mosley Jr.</td>
<td>WKUL-FM</td>
<td>Owner</td>
<td>7/22/2014</td>
<td>Better coverage for our size stations would benefit so many</td>
</tr>
<tr>
<td>Charles Shapiro</td>
<td>WLML-FM</td>
<td>VP of Broadcast Operations</td>
<td>7/23/2014</td>
<td>As a single station independent broadcaster, this will clearly help us better serve the public. Please allow this proposal to move forward.</td>
</tr>
<tr>
<td>Thomas Hodgins</td>
<td>Alexandra Communications, Inc</td>
<td>President</td>
<td>7/23/2014</td>
<td>A sliding scale type of system for all classes of commercial service whereby the limited factor was contour protection only would result in better service throughout. I support the C4 Petition.</td>
</tr>
</tbody>
</table>