

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Amendment of Section 73.207,) RM-11727
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)

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

COMMENTS OF WKLG, INC

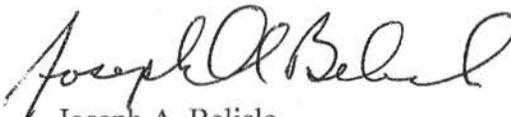
WKLG, Inc. submits the following comments in response to the proposal of SSR Communications Inc. ("SSR") to create a new FM Class C4 power class that would be assigned through the reduction of interference protection to stations which have not constructed maximum facilities for their assigned FM allotment's class.

SSR's proposal is constructed around the argument that licensees failing to construct the maximum facilities for their FM station's Class are engaged in a type of spectrum warehousing that is antithetical to the public interest. SSR does not suggest that this is some sort of moral failing on the part of licensees, but sees this as a failure of the FM allotment system to create FM classifications maximizing the use of FM spectrum. The solution, in SSR's view, is to create a Class C4 FM allotment through a procedure that would limit non-maximized FM stations to their Section 73.215 protected facilities.

WKLG, Inc. submits that there are means of addressing SSR's spectrum efficiency issues without reclassifying FM stations. Advances in FM booster technology hold the promise of expanding local programming on FM stations. Licensees should be allowed to use advanced booster technology to expand the FM service area of their stations to encompass the area that would otherwise be served by their stations operating at the maximum height and power allowable for their FM allotment. This use of FM booster technologies in a manner similar to the technologies employed in television distributed transmission systems would allow FM radio stations to maximize use of their FM allotment and to realize the full potential of their stations.

At a minimum, the Commission should allow FM stations that would otherwise be subject to reduced interference protection under the Class C4 classification regime, to avoid downgraded interference protection by employing advanced booster technology to expand their coverage areas to the limit of what would be possible using the maximum facilities authorized for their class of FM allotment.

Respectfully submitted,



Joseph A. Belisle
Counsel for WKLG, Inc.

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Leibowitz & Associates PA
2 South Biscayne Boulevard
Suite 2460
Miami, FL 33131

Tel. (305) 763-9437