



## NAB Files Comments in FM Translators for AM Proceeding

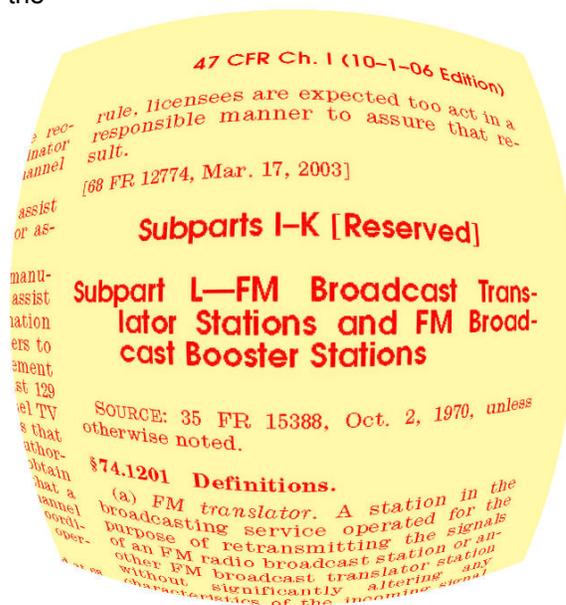
Over 300 comments have now been filed in the FCC's "FM Translators for AM" proceeding (MB Docket No. 07-172, comments due by January 7, 2008), and the vast majority of these are supportive of the Commission authorizing such service. NAB's comments strongly endorse the proposed rule changes "as a means to enhance AM radio service for the benefit of listeners, and enable AM radio stations to better compete in the ever-changing media marketplace."

The rule changes being considered are based on a petition filed by NAB in July of 2006 proposing that AM stations be allowed to operate FM translators to retransmit their AM programming as a fill-in service, as long as no portion of the 60 dBu contour of the FM translator exceeds the lesser of: (a) the 2 mV/m daytime contour of the AM station or; (b) the 25-mile radius of the AM transmitter site (see the August 20, 2007 issue of *Radio TechCheck* for more information on the FCC's Notice of Proposed Rulemaking which was issued in response to the NAB petition). Some of the specifics of the recently filed NAB comments include the following:

- Limitations on use of translators:** NAB states in its comments that all AM radio stations should be permitted to operate FM translators, regardless of station class, or whether the station currently has authority to operate during nighttime hours, or whether a station is a stand-alone entity or part of a co-owned group. The Commission should not attempt to distinguish among which kinds of stations are more deserving of an FM translator. Listeners of these stations are not concerned about the corporate structure of the station or its class of service. Listeners want and should have better reception and better access to the AM radio programming they value. The most equitable way to serve the needs of listeners would be to allow all stations, regardless of class or ownership structure, a fair opportunity to obtain authorization to operate one or more FM translators. The only suggested exception to this approach that NAB would support is Wisconsin Public Radio's recommendation that eligibility for FM translators in the reserved band be limited to noncommercial AM licensees, since such a restriction is consistent with the Commission's rules governing noncommercial services.

- Limits on the number of translators:** NAB's proposal is to limit the service of FM translators for AM to the smaller of a 25-mile radius from the AM transmitter site or the 2 mV/m daytime contour of the AM station. Given these restrictions, NAB believes it is unnecessary for the Commission to impose a ceiling on the number of translators an AM station may deploy, since AM stations have no incentive to incur the added costs of multiple translators, including electricity, maintenance, and insurance, unless absolutely necessary. Further, it would be wholly appropriate for the Commission to permit a station to operate multiple translators for the same public interest reasons as those underlying the Commission's proposed rule changes that would allow an AM radio station to operate a sole FM translator.

- Nighttime operation for daytime-only stations:** NAB supports the Commission's tentative conclusion to allow AM daytime-only radio stations to originate programming on FM translators during nighttime hours when they are not authorized to operate. This approach will also greatly benefit the 1125 AM stations that must operate with very low power at night. As the Commission recognizes, all of these AM broadcasters face unique competitive disadvantages because of their inability to compete during the all-important morning and evening



“drive time” hours. Allowing daytime-only stations and stations that must operate at “flea power” at night to use FM translators will radically improve these stations’ competitive position by significantly improving their service.

● **Coverage restrictions:** the proposed boundaries for FM translator for AM service guarantee that AM stations will only deploy an FM translator(s) as a fill-in service and not as a means to extend their coverage areas. NAB recognizes in its comments that in certain situations it may be impossible for a translator to exactly replicate these boundaries, in which case the Commission may deem it practical to permit a certain de minimis portion of a translator’s signal to extend beyond the AM station’s daytime 2 mV/m contour.

Reply comments in this proceeding are due on or before Monday, February 4, 2008. The full text of the NPRM is available on the FCC’s Web page at [http://fjallfoss.fcc.gov/edocs\\_public/openAttachment.do?link=FCC-07-144A1.pdf](http://fjallfoss.fcc.gov/edocs_public/openAttachment.do?link=FCC-07-144A1.pdf), and all filed comments are available for review using the FCC’s Electronic Comment Filing System (ECFS) – go to [http://gullfoss2.fcc.gov/prod/ecfs/comsrch\\_v2.cgi](http://gullfoss2.fcc.gov/prod/ecfs/comsrch_v2.cgi) and enter “07-172” (no quotes) in the first box (marked “Proceeding”), then scroll down and select “Retrieve Document List.”

## SDARS Terrestrial Repeater Comment Deadlines Set

As reported in the January 7, 2008 issue of *Radio TechCheck*, the FCC recently issued a *Second Further Notice of Proposed Rulemaking* (in IB Docket No. 95-91) seeking additional comment on the appropriate rules and policies for licensing of Satellite Digital Audio Services (SDARS) terrestrial repeaters. Comments on this rulemaking are due on or before Thursday, February 14, 2008, and replies are due on or before Monday, March 17, 2008. The full text of this FNPRM is available on the FCC’s Web page at [http://hraunfoss.fcc.gov/edocs\\_public/attachmatch/FCC-07-215A1.pdf](http://hraunfoss.fcc.gov/edocs_public/attachmatch/FCC-07-215A1.pdf). See the [July 30, 2007 issue](#) of *Radio TechCheck* for instructions on “FILING COMMENTS WITH THE FCC” (near the end of the article).

## Is Your AM DA Ready for HD Radio?



NAB Science & Technology is hosting a two-day course at NAB headquarters on March 6-7, specially developed to instruct broadcast engineers on how to prepare their AM stations for HD Radio. There is no similar educational opportunity for engineers to learn the proper techniques to maintain complex AM antenna systems ensuring that their stations comply with the FCC rules and enjoy optimum coverage and fidelity. Ronald Rackley, a principal in the firm of du Treil, Lundin & Rackley, Inc. Consulting Engineers and Ben

Dawson, President/Senior Electrical Engineer of Hatfield and Dawson of Hatfield and Dawson, will teach the course. Together they have collaborated to instruct the next generation of AM broadcast engineers and pass along the art of AM directional antenna system design and maintenance. They were awarded NAB’s highest engineering honor in 2006, the NAB Engineering Achievement Award for Radio. For more information on how to register and housing go to [AM DA Seminar](#) information on the NAB Website or contact Sharon Devine [sdevine@nab.org](mailto:sdevine@nab.org) or (202) 429-5338.

## NAB Provides Members with Energy Consulting to Lower Their Expenses

The APPI Savings Solution Program is a National Association of Broadcasters member-only benefit that manages and reduces member’s rising energy costs. Members who utilize this program will benefit from APPI’s extensive knowledge of and expertise in electricity and natural gas markets across the U.S. APPI analyzes, negotiates, and structures individual and aggregation supply solutions for NAB members in deregulated states. There are no upfront fees and compensation is results based. As energy costs continue to rise and decrease your bottom line, contacting APPI is a wise business decision. Contact APPI at (800) 520-6685 or e-mail [info@appienergy.com](mailto:info@appienergy.com) and be sure to mention you are an NAB member or visit the APPI website at [www.appienergy.com](http://www.appienergy.com).

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