

October 1, 2015

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

Re: Revitalization of the AM Radio Service, MB Docket No. 13-249, Notice of Ex Parte Communication

Dear Ms. Dortch:

The National Association of Black Owned Broadcasters (NABOB), the Multicultural Media, Telecom and Internet Council (MMTC) and the National Association of Broadcasters (NAB) each appreciate the Commission's, particularly the Media Bureau's, ongoing efforts to help revitalize AM radio. AM service is an important part of how our local communities are informed and entertained and provides a critical entry point for those who seek to have their voices heard, including women and minorities. While we understand that Chairman Wheeler remains committed to his new 250-mile waiver proposal and recognize some value in that approach, we strongly urge the Commission to combine that initiative with an exclusive window for AM stations to obtain FM translators. AM radio service is already significantly hampered and minority ownership is at dangerously low levels. The AM-only window is the only way to ensure that small, rural and minority stations do not get left behind.

We remind the Commission that since the window was proposed two years ago, there has been no meaningful opposition to it. In addition, an AM-only window to obtain FM translators has garnered widespread support from nearly every corner. Dozens of minority broadcasters wrote the Commission recently detailing its importance to their businesses and to paving the way for future minority station owners. The Congressional Black Caucus leadership echoed this sentiment as well. Former Commissioners Michael Copps and Robert McDowell authored a bipartisan letter detailing just how critical an exclusive window is for small and minority AM broadcasters.

Under these circumstances – no opposition and widespread support – we urge the Commission to take another hard look at the wisdom behind what it proposed on its own motion just two years ago. This is a critical time for AM radio and for minority ownership in general, and the Commission simply cannot afford to get it wrong. Thus, we propose that the Commission include an AM-only window for FM translators in addition to the Chairman’s proposed 250-mile waiver. That solution is the best way to serve the public interest.

Sincerely,

s/James L. Winston

James L. Winston
President
National Association of Black Owned Broadcasters

s/Kim Keenan

Kim Keenan
President and CEO
Multicultural Media, Telecom and Internet Council

s/Gordon H. Smith

Gordon H. Smith
President and CEO
National Association of Broadcasters