



GREGORY RIGGLE
VICE PRESIDENT
INDUSTRY RELATIONS &
BUSINESS COMMUNICATION

April 3, 2013

Hon. Julius Genachowski, Chairman
Hon. Mignon Clyburn, Commissioner
Hon. Robert McDowell, Commissioner
Hon. Ajit Pai, Commissioner
Hon. Jessica Rosenworcel, Commissioner
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: FCC File No. BPFT-20121116ALE

Dear Chairman Genachowski & Commissioners:

My name is Gregory Riggle and I am Vice President of Industry Relations & Business Communication at SESAC.

SESAC is the second oldest performing rights organization in the U.S. and has been proudly providing licensing services to the radio industry since the 1930's. Radio stations license performances of SESAC's continuously growing repertory of music across all genres and formats including music used in advertisements, promotional messages, and Jingles.

SESAC has client relationships with over 3800 AM radio stations and I write you today to voice support of Commissioner Pai's 2013 "AM Revitalization Initiative" and to express SESAC's view of the pending "Tell City Waiver Request" currently under the Audio Division's review.

It is impossible to overstate the value of AM Radio. In the 1940's AM Radio became the "American Voice" of patriotism & unity for a world at war. In the 40 years that followed, AM stations emerged as influential economic engines for local businesses and set the standard for tireless community assistance and service in small towns and

cities throughout rural America. AM Radio has been informing and inspiring the daily lives of listeners for three generations and its unique brand of news, information, entertainment, and dedicated public service has created a legacy of reliability and community stewardship unparalleled in American Media.

In spite of its innumerable contributions, AM Radio is unquestionably in a state of decline. In recent years, reception interference and reduced coverage in overnight hours have endangered the technical viability of the service and AM has lost a "generation" of listeners as a result. The marketplace reality is that over 80% of Radio's audience has migrated to FM. Improving the breadth and quality of the AM signal is a noble cause that will benefit the radio stations' local communities.

On behalf of SESAC's affiliated songwriters, SESAC urges the committee to increase the number of AM stations broadcasting via FM translators. This course of action is the most responsive measure to Commissioner Pai's ambitious 12 month AM Revitalization timetable. While AM broadcasting on FM translators has proved to be transformative for operators and the communities they serve, we have learned that the availability of FM translators is in fact, quite limited, based on the minimal miles radius restriction in Section 74.1233(a)(1) of the Commission's rules. We understand and passionately endorse The Tell City Waiver Request that seeks a simple procedural change to extend the distance an FM translator can be moved and that will afford many more AM stations the opportunity to acquire "in-contour" FM translators for the benefit of listeners in the community.

On behalf of the 3800 AM radio stations that keep America informed of news, social commentary, potential dangers, and community joys and sorrows, SESAC urges the Commission to grant The Tell City Waiver. Doing so will affirm the Commission's commitment to removing regulatory barriers and strengthen AM Radio's resolve to innovate and revitalize.

This is a pivotal time for Radio, and SESAC is hopeful that you will give this important matter your informed consideration in the early days ahead.

Respectfully submitted,

SESAC

A handwritten signature in black ink, appearing to read 'Gregory Riggle', with a long horizontal stroke extending to the right.

Gregory Riggle
V.P. of Industry Relations & Business Communication

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