



January 16, 2013

Re: FCC File No. BPFT-20121116ALE

Good Morning!

I am writing in full support of the waiver request for the FM translator for WTCJ AM, Tell City Indiana to allow it and other AM broadcasters to move an FM translator a greater distance than the FCC's rules now allow. The application is **FCC File No. BPFT-20121116ALE**.

**This is about AM stations and AM revitalization , NOT about FM translator speculators.** Please do not let proclivity to punish FM translator speculators make this very valuable service unavailable to struggling AM operators and the service they provide to their communities.

This action would have an immediate, substantive effect upon the vitality of many AM stations. While there are a number of ideas for revitalizing the AM service , most will not bear fruit for many years.

The ability to acquire a FM translator for my AM station would greatly increase the ability of WESR AM to serve the community in times of emergency and provide valuable public service announcements, emergency weather and urgent local news during the overnight hours. Recently during Sandy, WESR AM was forced to operate on 50 watts due to nighttime restrictions reducing the number of people covered by our signal by 90%.

This action can be completed at very little cost and will provide immediate relief to our AM situation and especially who struggle to serve outlying communities as AM stand alone operations.

Please give this urgent matter your full consideration.

Kindest Regards,

Charlie Russell Owner-Operator

WESR AM/FM, Onley Virginia



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Ontario, Ohio 44906  
(419)529-5900 • FAX (419)529-2319  
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Honorable Commissioners  
Federal Communications Commission  
Washington, D.C.

January 16, 2013

Dear Commissioners,

The AM Radio band and the thousands of local AM stations who have served their communities for decades is under fire from new technologies such as new light bulbs, traffic control systems, computers, etc that create tremendous amounts of interference, denying local residents of the vital public safety information, local news, sports and weather that we all have counted on our entire lives.

A understand there is an effort at the FCC to **"Revitalize the AM Broadcast stations of the country"**. There appears to be wide spread interest by many of you, which is wonderful news.

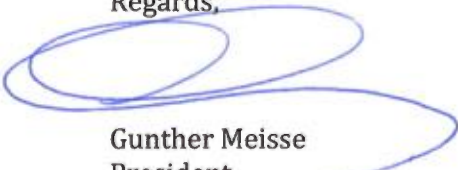
There is presently a Waiver request [The Tell City Waiver Request] pending at the FCC (**File No. BPFT-20121116ALE**), which you will likely act upon the third week of January. The waiver requests the abolishment of decades old rules that unreasonably prohibit an AM broadcaster from moving an **FM Translator** significant distances to be located within the AM stations community and rebroadcast the programming of the AM station on the FM Translator station, which, when implemented, provides that community with the 24/7 quality programming service it has historically enjoyed.

One of our stations, (WRGM-AM), here in Ontario/Mansfield, Ohio, was lucky enough to purchase an FM translator which is now in service simulcasting WRGM-AM and providing our community with the service the public enjoyed. It was previously located in a nearby community so the moving process was less cumbersome. However the present FCC rules forbid the simplistic moving of a perspective FM Translator over significant distances to solve such local service needs. This proposed Waiver will solve this problem and allow AM broadcasters to find willing sellers, who's FM Translator would technically fit within their home community and "Revitalize" their AM station operations with its attendant local community service. While this Waiver does not directly involve our stations, it sets the stage for modification of the FCC rules to assist AM broadcasters all over the country in better serving the Public Interest, Convenience, and Necessity. The charge we all take when we entered the broadcast business.

I am respectfully requesting that you be actively involved in this important nationwide issue with local impact. **You can make the positive difference!**

I can say, beyond any doubt, that the acquisition of an FM Translator saved our station from extinction. We are now back in the business of SERVING our community 24/7!

Regards,



Gunther Meisse  
President  
GSM Media Incorporated



124 East Main Street  
Bloomsburg PA 17815



(570) 784-1200  
Fax 784-6060

January 18, 2013

To Whom It May Concern:

My Name is Joe Reilly. I am president of a small radio company that owns an AM station in Bloomsburg, Pennsylvania. In 2001, after 30 years of corporate radio and having programmed 3 News-Talk AM stations in the top 50 markets, I was bullish on AM and I purchased a silent AM station that was taken dark by the local newspaper, The Press-Enterprise. Not only did we buy a "silent" station, but the asset purchase agreement did not include the tower! So, we literally had to rebuild the station from the ground up.

Today, News Radio 930 WHLM is a full service station and the crown jewel of our company. It programs local news, weather, traffic, sports, local commentary and has been recognized by CBS for our local coverage and received an award for the best local sports coverage from the Pennsylvania Association of Broadcasters.

Over the past 10 years we programmed non-stop, wall-to-wall flood coverage during 4 devastating floods. The last one in 2011, was the worst in the history of record keeping and destroyed or negatively impacted 25% of our housing stock here in Columbia County, Pennsylvania.

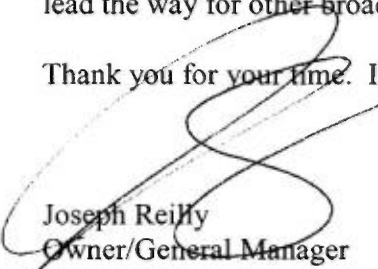
To a large degree, the perception that few people listen to AM radio is a reality because, the kind of programming that is required to keep AM viable, is costly and difficult to squeeze into a successful business model. However, this perception can be broken with the help of an FM translator.

In our case, we serve three communities with our healthy daytime AM signal but at night we must power down to 18 watts! We were fortunate to acquire 3 translator CP's with the purchase of an FM station. I guess you could call us lucky, as the FCC rules changed at about the same time allowing us to use these FM translators to help our AM station maintain its daytime footprint at night.

There is a term used in the housing construction industry called "sister-ing." When rehabbing a house with structural issues, dropping in a new joist or stud next to a bad one, due to termites or rot, is a technique called a "sister" joist or stud. It helps to make for a "sound" structure. Using the same concept of "sister-ing," (and isn't it interesting that the industry for many years has used the term "sister" stations,) an FM translator alongside an AM will make it "sound" again...literally!

The single biggest thing the FCC could do to help broadcasters like us, is to help us facilitate the acquisition of these sister translators. I am writing in support of Bud Walter's waiver to help his Tell City, Indiana AM station obtain one of these FM translators by cutting down on some of the technical red tape keeping him from accomplishing this goal in a quick and meaningful manner. What he is asking is courageous and could lead the way for other broadcasters to serve their communities better and making AM once again viable.

Thank you for your time. I hope you consider my comments.



Joseph Reilly  
Owner/General Manager  
Columbia Broadcasting Company



*Radio for the River Bend*

January 18, 2013

Honorable Commissioners  
Federal Communications Commission  
Washington, D.C.

WBGZ is a stand-alone 1kw AM station serving the residents of Alton, Illinois and surrounding communities since 1948. As the owner/operator, I can tell you that our task of serving our community is becoming increasingly compromised due to factors inherent to the AM band. The rise in the noise floor makes our relatively weak upper-band AM signal increasing difficult to receive. The need to reduce power at night eliminates the availability of our signal to a large portion of the residents who depend upon us.

Necessarily, there is now discussion of the revitalization of the AM band. I am writing to tell you that there is nothing that will have a more immediate and profound effect on the vitality of AM stations such as WBGZ than the Tell City Waiver request.(File No. BPFT-20121116ALE).

Ever since the Commission authorized AM on FM translators, I have worked diligently to acquire an FM translator so as to make our community-centric programming more widely available. However, the fact that WBGZ is located within a major market metro (St. Louis), the regulations regarding the movement and frequency migration of any available translators have thwarted my efforts.

Note that I am more than willing to make a significant investment in order to better serve our community. However, regulatory issues have made it not only difficult, but nearly impossible, to breathe new vitality into my community-oriented AM station.

Nothing will have a more immediate effect on our effort than the approval of the Tell City Waiver request. I urge approval of the request as soon as possible. Doing so will be an immediate and significant step in Commissioner Pai's initiative for AM revitalization.

Sincerely,

Samuel M. Stemm  
President  
Metroplex Communications, Inc.



Honorable Commissioners  
Federal Communications Commission  
Washington, DC

Dear Commissioners:

I am writing to provide feedback to the **Revitalization AM Broadcast Stations of the Country** that has its roots in **The Tell City Waiver Request**.

As an operator of small market radio stations, I understand the pressures faced by AM stand-alone stations dwarfed by major market stations from bigger cities outside of the local service area. These out of market stations don't serve the local market as passionately as the local broadcaster, but by virtue of the fact that they are FM and the local broadcaster is too often times just AM, the local caring and committed operator loses listeners. And without listeners, you cannot sell ads and stay in business.

That means standalone AMs have the greatest potential to go dark in the next 5-10 years.

For our group of stations in Eastern North Carolina, we have three and will soon have four AM stations. Fortunately we are a part of Curtis Media. Don Curtis is committed to Serving the Public, and has the financial resources to implement the purchase of translators. And in spite of this, we have only been able to acquire one translator so far. And for that, we have paid a premium price. If we had been locally owned, which most stations like us are, the ability to come up with hundreds of thousands of dollars to buy more translators would have been virtually impossible.

If we were able to revitalize our other AM stations with FM translators, their position in the community would be preserved for as long as FM continues to be used by listeners. And the audiences served by these stations would continue to receive vital local news and information.

Should the Commission move to make it easier to move translators, the cost would come down and the availability would go up. In that scenario, local stations like ours would be able to continue to Serve the Public in ways only local broadcasters can.

I respectfully ask that you help make the Revitalization of AM Broadcast Stations a reality. By doing so will have an amazing impact on our ability to be relevant in our local market for our local listeners.

Sincerely,

Bill Johnston  
General Manager  
Curtis Media, Goldsboro / Kinston, NC



**HPL Communications, Inc.**

WBTA Radio  
113 Main Street  
Batavia, NY 14020

Bus: 585-344-1490  
Fax: 585-344-1441

January 16, 2011

Bayard H Walters, President  
Cromwell Group, Inc  
PO Box 150846, Nashville, TN 37215

VIA FAX

Dear Bud:

This letter is in support of the efforts of you and others seeking a waiver in FCC policy to move a translator farther than is now permitted.

I am the licensee of WBTA-AM in Batavia, NY. To date, we have been unable to secure an FM translator for our station.

We are located in a county of 60,000 people located almost exactly between Buffalo and Rochester, New York. We are the only commercially licensed station in the county. WBTA has been on the air since February, 1941, and has been honored numerous times for its service to the community.

While our daytime signal does a good job of blanketing our county, the nighttime signal with all of its inherent interference, is hardly listenable beyond our city limits. An FM translator service for WBTA would yield the reliable coverage for our community that the translator service was originally intended to provide.

WBTA is strongly in favor of any FCC rule or policy change that would increase the opportunity to obtain an FM translator and improve service to our community.

Sincerely,

Daniel C. Fischer  
President

CC: John Garziglia, Esq.



WILLIAM H. PAYNE  
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24189 E. 865 Road  
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→ Thursday, January 17, 2013

Dear Bud:

Increased distance for translators could mean great things for any of broadcasters with an **AM** station. To be able to have access to the increased distance for a translator would mean not only an enlarged listening audience; it would mean listeners after dark, which is not really an option with our small **AM** stations at these 10 seconds.

Not only would such actions transmit into enlarged audiences, they would also increase the advertising revenue for the **AM** stations. They would also serve the public good by giving listeners access to things that mean something to them (local sports events, weather, current activities, events, etc.) and allow them to listen to their 'favorite' station(s) throughout the day and night. Currently, most **AM** stations either go off at dusk or have such reduced broadcasting capabilities, that the public is not well served at all.

Yes - **FM** translators for **AM** stations at increased distances would indeed open another door. Licensees with **AM** stations are greatly inhibited at this time. Allowing the use of the translators would be infinitely better for all concerned, especially the listening public. The use of this type of system would infinitely improve broadcasting for everyone concerned . . . beginning with the public and going down to the broadcasters.

Good luck with your meeting. You are plowing a new row, but it could be for the benefit of everyone. My best as always.

Yours truly,

A handwritten signature in dark ink, appearing to read "William H. Payne", written in a cursive style.

WILLIAM H. "Bill" PAYNE

cc: John Garziglia



1/17/2013

Federal Communications Commission  
Washington, DC

Dear Commissioners,

My name is Bob Simmons, licensee of a small group of 6 radio stations located along the US/Canadian border in North Dakota. Two of my outlets are 'technically challenged' AM facilities. KNDK at Langdon, ND operates with 1 thousand watts day and 50 watts night. KXPO at Grafton, ND operates fulltime with 1 thousand watts. Due to the increased noise floor both of these stations now struggle to serve their communities particularly at night.

Currently the commission is investigating a number of remedies that would preserve and revitalize the AM broadcast band. One option before you that in my opinion would provide immediate relief to stations such as mine and countless others would be the relaxation of the regulatory barriers that now prohibit the moving of FM translators by great distances. As I understand it, this rule is 'procedural' and dates back several decades. I want to stress that I am advocating on behalf of existing AM broadcasters like myself whose communities would immediately benefit from translator service and NOT on behalf of speculators. In my situation FM translators would be of great benefit particularly at night where we often hear negative comments from listeners and advertisers in regards to the 'poor signal quality' of our local high school sports broadcasts which is a direct result of noise generated by everything from overhead power lines to dimmer switches, computers etc. etc.

In closing, I am most encouraged by the positive comments of Commissioner Pai in regards to revitalizing the AM broadcast band. Please grant the 'Tell City Waiver' request FCC File No. BPFT-20121116ALE.

Regards,

Bob Simmons  
President

Simmons Broadcasting Inc.



# Miller Media Group

918 East Park Street, PO Box 169, Taylorville, IL 62568-0169

Phone: 217-824-3395 · Fax: 217-824-3301

Randal J. Miller, President



November 28, 2012

To Whom It May Concern:

I am in support of a waiver request filed with the Federal Communications Commission, FCC File No. BPFT-20121116ALE, to move an existing FM translator in order for it to simulcast WTCJ, an AM radio station in Tell City, Indiana.

WTCJ, along with AM radio stations across the country, continue to be challenged with man-made interference that challenges their ability to retain and grow audiences.

The FCC has wisely granted the ability for AM radio stations to simulcast on FM translators when they're available.

This waiver request would allow the FM translator to be moved a distance, in order to help WTCJ provide local radio service to Tell City, Indiana and surrounding area.

As a licensee of 3 AM radio stations, all of which are simulcast on FM translators we've been blessed to acquire and use, I can personally attest to the importance of continuing to provide local radio service that's been heard for decades on my AM stations, by having the same programming simulcast on FM translators that are not as susceptible to man-made interference as the AM signal.

I would ask that the Commission grant the waiver request of WTCJ so that it can continue to provide local radio service in Tell City, Indiana, on the FM dial as well as the AM dial.

Respectfully,  
Randal J. Miller  
President  
Miller Communications, Inc.  
Virden Broadcasting Corp.  
Kaskaskia Broadcasting, Inc.



**EAB** EAST ARKANSAS BROADCASTERS, INC.  
P.O. BOX 789 • WYNNE, ARKANSAS 72396

February 7, 2013

Julius Genachowski  
Chairman, FCC  
Room 8-B201  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554  
Dear Chairman Genachowski,

On behalf of East Arkansas Broadcasters, I am writing to express my support for more AM coverage on FM Translators. This is currently being considered under the Tell City, Indiana WT CJ(AM) application filed under BPFT-20121116ALE.

East Arkansas Broadcasters has been a family owned group of radio stations since 1956. We take great pride in providing a lot of local programming including local news, sports, and weather 24 hours a day. Many of our radio stations are AM and are located in rural areas of the Mississippi River Delta region and do not cover our entire local communities at night.

I believe there will be a great benefit for an expanded effort to allow AM coverage to a broader local geographic area using FM translators. Since we are in rural areas, we would be able to serve our entire community if we were able to use FM translators without a large capital expenditure cost. This will be helpful since we aren't a large organization. Providing this increased level of flexibility with FM translators would allow us to provide expanded service to our current daytime listeners at night.

Thank you very much for your consideration. If I can be of any help, please feel free to contact me at 870-238-8141.

Sincerely,

Bobby Caldwell  
Owner/CEO