



Jeffrey H. Smulyan
Chairman of the Board

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APR 30 2013

Federal Communications Commission
Bureau / Office

April 30, 2013

Hon. Julius Genachowski
Hon. Robert McDowell
Hon. Mignon Clyburn
Hon. Jessica Rosenworcel
Hon. Ajit Pai
Federal Communications Commission
Washington, DC 20554

Re: Application File No. BPFT-20121116ALE
(Request for Waiver for FM Xlator rebroadcasting AM Station)

Dear Mr. Chairman and Commissioners:

Our company has owned and operated radio stations for more than thirty years, and during that time we have seen numerous changes in our industry, both positive and negative. Of the latter, among the most disturbing is the increasing difficulty faced by AM stations as they struggle to compete against other media that are not handicapped by the same technical problems.

As a long-time operator of AM stations, we believe that such stations provide an important public interest service and that the Commission should consider ways of preserving and revitalizing them. Unfortunately, there are very few, if any, meaningful and practical technical solutions within the AM spectrum. A number of creative and worthy proposals have been advanced that involve use of other spectrum, including relocation to spectrum occupied by TV channels 5 and 6. But we believe that shorter-term solutions are also necessary. The Commission has already taken the salutary step of permitting FM translator stations to rebroadcast AM station signals. At this point, however, only a relatively small percentage of AM stations have been able to take advantage of FM translators. We urge you to give careful consideration to the waiver requested in the above-referenced application, which would provide greater flexibility in the relocation of FM translators to be used for rebroadcasting AM signals. We believe that grant of such a waiver would provide an immediate benefit to a significant number of AM stations by increasing the number of translators available to them.

Sincerely,

A handwritten signature in dark ink, appearing to read 'JHS', is written over the name Jeffrey H. Smulyan.

Jeffrey H. Smulyan

cc: John F. Garziglia, Esq