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3636 16th Street N.W. Suite B-366
Washington, D.C. 20010
Phone: 202-332-0500 Fax: 202-332-0503
www.mmtconline.org

February 12, 2013

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

RE: AM Revitalization Request Waiver Joint Request of Hancock Communications, Inc., the licensee of WTCJ(AM), Tell City, Indiana, and WAY Media, Inc., FCC File Number: BPFT-20121116ALE

Dear Chairman Genachowski and Commissioners:

MMTC respectfully submits this letter of support for the waiver request made in the aforementioned proceeding. The Commission's grant of this waiver would result in the one-step move of the FM translator service at W218CR, Central City, Kentucky, from its current location and channel, 218, to Channel 279, from which WTCJ(AM) ("WTCJ"), Tell City, Indiana, may be re-broadcast on the translator.

Over the years, WTCJ, and many other AM stations, have fallen victim to the Commission's Section 74.1233(a)(1) regulation that restricts FM translator moves based on a minimal miles radius calculation. This has resulted in it being almost impossible for many stations, including WTCJ, to find an FM translator available for acquisition. As a result, WTCJ is petitioning the Commission to waive this regulatory barrier, thereby opening up the opportunity for FM translator service to bolster its stymied AM station. To that end, MMTC supports WTCJ's petition and respectfully requests that the Commission grant the waiver.

MMTC has long championed the importance of AM radio, not only in minority communities, but in the role it has played for the communications industry as a whole. AM revitalization can benefit the communities the stations serve by

enhancing access to programming upon which many have depended for decades, increasing revenue for AM stations, and serving the public interest of preserving a vibrant and diversified arena for thoughts and ideas. However, these benefits have yet to be truly achieved. For example, AM reception interference has grown exponentially, especially since the advent of the Internet, which has had a negative impact on AM programmers' abilities to reach their audience. By making it easier for AM stations to move to existing FM translators farther away, more stations would be able to re-broadcast their AM signals and thus increase accessibility for AM listeners in their respective areas while furthering the Commission's goals.

Presently, around two-thirds of minority-owned radio stations are AM stations. Thus, these regulations are even more detrimental to minority broadcasters, who typically own stations with inferior technical parameters and have a difficult time reaching their intended audience because the stations are located far from the centers of the urban markets they generally serve. By making it easier for AM stations to move to existing FM translators farther away, more stations would be able to re-broadcast their AM signals and thus increase accessibility for AM listeners in their respective areas while furthering the Commission's goals.

Although other solutions have been suggested, none have had as much of an immediate benefit to all interested parties as allowing FM translator moves of an appreciable distance, as discussed in WTCJ's petition. For example, saving the AM technical facility would not be a viable long term solution. Even if the Commission allowed AM stations to increase their power, that change would not only be cost prohibitive for most AM station owners, but it would still not be enough to address noise interference issues. Moreover, although MMTC has long championed moving AM to Channels 5 and 6, we recognize the difficulty of that occurring in a time frame that would be relevant to WTCJ's present application. For AM revitalization to be successful, existing FM translators must be able to be moved.

MMTC wholeheartedly agrees with WTCJ that there are enough FM translators, both licensed and applied-for, that removing these regulatory barriers would be a win for AM revitalization and the listening public. This act would result in increased community viewership, increase advertising revenue for the stations, and a more positive public image for AM radio. For all these reasons, MMTC supports WTCJ's petition for waiver and recognizes that by granting said waiver, the Commission will assist in revitalizing AM radio, serving community interests, and reducing destructive and inhibitive regulatory barriers in the communications industry.

Respectfully submitted,

David Honig

David Honig
President and Executive Director
Latoya Livingston
Senior Attorney and Earle K. Moore Fellow
Minority Media and Telecommunications Council
3636 16th Street NW, Suite B-366
Washington, D.C. 20010
(202) 332-0500
dhonig@crosslink.net