

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Proposed Rules Permitting Antenna)	MB Docket No. 93-177
Modeling To Verify AM Directional)	DA 07-2143
Antenna Performance)	
)	
)	

To: The Commission

Comments of the Society of Broadcast Engineers, Inc.

The Society of Broadcast Engineers, Incorporated (SBE), the national association of broadcast engineers and technical communications professionals, with more than 5,000 members world wide, hereby respectfully submits its comments in the above-captioned notice of proposed rulemaking (NPRM), a supplemented by the Media Bureau’s May 23, 2004, Public Notice “Comment Sought on Proposed Rules Permitting Antenna Modeling To Verify AM Directional Antenna Performance” (DA 07-2143, released May 23, 2007).

I. SBE Supports the Coalition Proposal

1. In the Public Notice the Media Bureau solicited comments on the recommendations of the *AM Directional Antenna Performance Verification Coalition* (the “Coalition”), submitted on May 4, 2007. The Coalition recommended that the FCC allow, but not require, the use of method of moments (MoM) computer modeling to demonstrate that a medium-wave amplitude modulation (AM) directional antenna system is performing as designed. The proposal would also allow determining the effect of nearby re-radiators, and would be mandatory if the array was originally licensed using method of moments computer modeling.
2. In general SBE supports both the Coalition's recommendations and the new and modified rules that are being proposed to implement those recommendations. Computer modeling and internal array pattern monitoring should accurately and reliably verify the performance of most, if not all, medium wave directional antenna systems, and should substantially reduce the time required of both applicants and Commission staff to perform a directional antenna proof of performance.

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Performance of AM Directional Antennas**

3. SBE notes that the Coalition proposal would in no way change Section 73.184 of the FCC Rules, which allows measurements to determine actual ground conductivity values that may be different from the ground conductivities shown in Section 73.190, Figure R3, of the FCC Rules (Figure R3 is a reproduction of the larger size M3 map).

4. SBE further notes that under the Coalition proposal, the FCC Form 302 license application filed to consummate a construction permit for an AM directional array would require inclusion of the MoM documentation as to the correct performance of the as-built array. SBE additionally notes that Section 73.1620(a)(4) of the FCC Rules governing program tests does not permit automatic program test authority (PTA), and that no change to this restriction is proposed. Therefore, the method of moments showing that would be required to be included in the license application would first have to be affirmatively reviewed by an FCC engineer before PTA would be issued. That is, the licensing process for AM stations with directional antenna arrays would remain a positive-option PTA process, and not the negative-option, automatic PTA allowed for non-directional AM and FM stations, and for both non-directional and directional TV stations. Thus, SBE again sees the rule changes proposed by the Coalition as a reasonable balancing of new and more efficient technologies with prudent oversight safeguards.

5. An advantage of a license application based on MoM is that an electronic filing then becomes practical, and an electronic file exhibit documenting the MoM will be quickly downloadable by any interested party 5, 10, or 20 or more years from now. This would be an improvement over the current situation, which often requires using the Commission's official copying service to obtain copies of full or partial proofs when the original proofs have been lost, or were so badly worn as to be unreadable.

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II. Summary

6. For the reasons set forth above and in the Coalition's comments, SBE supports the proposal to update the FCC Rules regarding the performance of AM directional antenna systems.

Respectfully submitted,

Society of Broadcast Engineers, Inc.

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SBE President

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