



Client Memo

By Gary Cavell - October 2015

Client Memo on AM Translator Considerations and Cautions

In the FCC's October 2015 ***Report and Order*** on AM Revitalization, the FCC addressed a topic of considerable interest for the AM broadcasting community – making FM translator stations more readily available for AM station use. While they also dealt with other matters, the FM translator matter seems to be of paramount interest to the AM community for the moment.

The good news is, albeit with certain conditions, limitations, and caveats, the door will be opened early next year for AM station owners to try to find, acquire, and relocate existing FM translators to or near their AM sites. This will undoubtedly help daytime only stations and the lower power stations as well. And in fact, the first FCC filing window will be exclusively reserved for those kinds of stations (Class C and Class D stations). A second, following window will be thrown open for ALL stations to acquire, relocate and change existing translators. By 2017, a final window will be opened for NEW translator proposals.

The key factors for an AM station owner looking to participate include:

- 1 - Finding out if there a commercial band FM frequency (92.1 to 107.9 MHz) available for the translator's use at your desired translator location

- 2 - Finding out if there are any translators that might be available for consideration – only those located with a 250 mile radius of your station are eligible for your use (According to the FCC, they will allow you to change an existing translator's frequency to one that will satisfy their interference prevention rules at your new location.)

- 3 - Determining if the translator could be located in a place that would make sense for your purposes coverage-wise, and;

- 4 - Determining if the prospective translator's 1 mV/m (60 dBu) coverage footprint meets the FCC's AM translator location restrictions (the limitation that the translator's 60 dBu contour be contained within the AM station's daytime 2 mV/m contour and not extend more than 25 miles from the AM transmitter site).

The first item is really the more critical aspect, but most people seem to fixate instead on looking at the available universe of translators located within 250 miles of their station. Fortunately, there are several entities that provide this for free, including the FCC's site and our own FCCInfo site.



But again, even if a translator is within range and can be reasonably acquired, some homework is in order to make sure it can be used for your station. Further, a bit of strategy is in order if you suspect that other AM stations in your market might also be in the hunt for a translator if the number of possible commercial frequencies is limited. Also, since translators are “secondary services” and subject to being displaced by interference complaints or moves/upgrades of other FM stations, some thought should be given to which of your choices would be least vulnerable to such issues.

One other important fact to understand is that the translator needs to remain associated with the parent AM station for four years.

Any station owner exploring this opportunity should really seek competent technical/engineering counsel as well as experienced legal assistance. As simple as the opportunity first appears to be, there are many complications involved.

Again, understand that this will be a “first come – first served” window. Competition for usable frequencies may be strong within some markets, so just filing a credible application proposal doesn’t guarantee that you will receive a grant.