

**STATEMENT OF  
COMMISSIONER MICHAEL O'RIELLY**

Re: *Revitalization of the AM Radio Service*, MB Docket No. 13-249

In this Second Further Notice of Proposed Rule Making, the Commission is considering further reducing the contour by which Class A stations are protected at night, in order to represent a more realistic view of where a listenable signal is, and, therefore, actual listeners. At the same time, the Commission also has proposed to enhance Class A stations' co-channel interference protections, thereby reducing the potential impact on Class A stations' nighttime service.

The Commission bases its new proposal on engineering data in the record indicating that protection of the 0.1 mV/m Groundwave contour cannot be heard under current noise conditions. Therefore, it is contended, that it is only necessary to protect Class A AM stations to their 0.5 mV/m Groundwave contour. If true, I would be more sympathetic to this change as it wouldn't alter the realistic reach or expectations of those holding existing licenses. I appreciate the Chairman accommodating my request to clarify that, at this time, this is not a universally held viewpoint. I hope the record will reflect a consensus by engineers on how far a listenable signal extends. I will be hesitant to support a final order on this proposal without such consensus. However, at this stage, I support moving forward and developing a record on this, and other, important questions presented in the SFNPRM.