



To All Radio Clients

June 19, 2007

**FCC SEEKS COMMENT ON PROPOSED RULES TO PERMIT ANTENNA MODELING  
TO VERIFY AM DIRECTIONAL ANTENNA PERFORMANCE**

**COMMENTS DUE JULY 23, 2007  
REPLY COMMENTS DUE AUGUST 22, 2007**

The Media Bureau recently released for public comment the recommendations of an *ad hoc* technical group of radio broadcasters, equipment manufacturers and broadcast consulting engineers, acting as the AM Directional Antenna Performance Verification Coalition ("Coalition"), for changes to the FCC's rules that would permit the use of moment method computer modeling to demonstrate that AM directional antennas perform as authorized. Computer programs to predict antenna performance are generically referred to as "moment method" or "NEC" programs. NEC programs are based on the Numerical Electromagnetics Code moment method of analysis.

Comments in this proceeding are due by July 23, 2007, while reply comments are due by August 22, 2007.

The Media Bureau seeks comment on the following proposed new and modified rules:

- ▶ The modification of Section 73.151 to permit the verification of performance of an AM directional antenna system either by computer modeling and sample system verification or by the performance of field strength measurements. The proposed rule specifies the computer modeling parameters to be employed.
- ▶ A new Section 73.155 that requires any AM station that is licensed with a directional antenna pattern pursuant to a proof of performance using moment method modeling

and internal array parameters to recertify the performance of that directional antenna pattern at least once within each 24 month period.

- ▶ The modification of Section 73.61 to give the FCC the authority to require an AM station to conduct either a partial proof of performance using field strength measurements or a full proof of performance using computer modeling and sample system verification whenever there is an indication that the AM station's antenna is not operating as authorized.

- ▶ A new rule under Part 17 that would replace Section 22.371, Section 27.63, and Section 73.1692 and harmonize FCC procedures in connection with disturbances caused to AM stations as a consequence of construction near or installation on an AM broadcast antenna system or tower.

A copy of the Coalition's recommendations, including copies of its proposed rules, which were prepared by this office, are available on the FCC's website at [http://gulfoss2.fcc.gov/prod/ecfs/comsrch\\_v2.cgi](http://gulfoss2.fcc.gov/prod/ecfs/comsrch_v2.cgi) under MM Docket No. 93-177.

Should you have any questions or if you wish to file comments in this proceeding, please contact our office.

*Leventhal Senter & Lerman PLLC*

This memorandum is intended only as a general discussion of these issues and should not be regarded as legal advice. To discuss any of the issues presented here, please contact any attorney in our office.