

RM-11727: FM Class C4 / Section 73.215 Revisions Proposal

Frequently Asked Questions

- What is RM-11727?

RM-11727 is a Petition for Rulemaking that the Minority Media, Telecom, and internet Council (MMTC) and SSR Communications, Inc. (SSR) filed jointly before the Federal Communications Commission (FCC) in January, 2013. RM-11727 asks the FCC to create a new FM broadcast station allotment, FM Class C4, which would allow radio stations in Zone II of the United States to specify facilities of up to 12,000-Watts of effective radiated power from a reference antenna height above average terrain of 100 meters. RM-11727 would also assign 73.215 status to certain stations which have been operating below their full parameters for a period of ten consecutive years or more, provided that a valid “triggering” application from an adjacent station requests such a change:

<https://ecfsapi.fcc.gov/file/7022114061.pdf>

- Who could benefit from RM-11727?

MMTC and SSR have identified approximately 800 FM Class A radio stations, many of which are situated in rural areas and are independently operated, that could upgrade to the new C4 FM station classification. Still more stations of all classes would be able to upgrade or eliminate their directional antenna patterns with changes to Section 73.215:

<http://www.wyab.com/petition/maps/>

- Which primary services would suffer from RM-11727?

The full implementation of RM-11727 would only consume previously unallocated bandwidth. In other words, *no new predicted interference* to the primary service contours of existing stations would occur as a result of stations taking advantage of the RM-11727 initiative.

- Which secondary services would suffer from RM-11727?

Although secondary services, such as FM translators, are not eligible to receive interference protection from other broadcast facilities, they do serve an important role in today's broadcast environment. In October, 2016, SSR identified the 217 FM Class A stations deemed “most likely” to take advantage of the FM Class C4 allocation and found *no net impact* to translators. Not one FM translator would be required to sign off as a result of new C4 FM classification:

<http://www.radioworld.com/business-and-law/0009/commentary-impact-of-a-class-c4-allocation-on-fm-translators/338517>

- Who supports RM-11727?

When the FCC took formal comments on RM-11727 in 2014, approximately 90 broadcasters filed supportive letters, while only one respondent registered strong opposition to the proposal. Additionally, another letter asking the FCC to act on the matter received signatures from 144 broadcasters representing 656 total stations, with several additional station owners signing the document after the FCC had already taken formal comments. Finally, then-FCC Commissioner Ajit Pai expressed his support for investigating the proposal at the NAB/RAB Radio Show in Nashville, Tennessee, in September, 2016:

<http://www.wyab.com/petition/main.cgi?sigview=1>
<http://www.wyab.com/petition/OneSheetSigned.pdf>
<http://rbr.com/pai-classc4/>