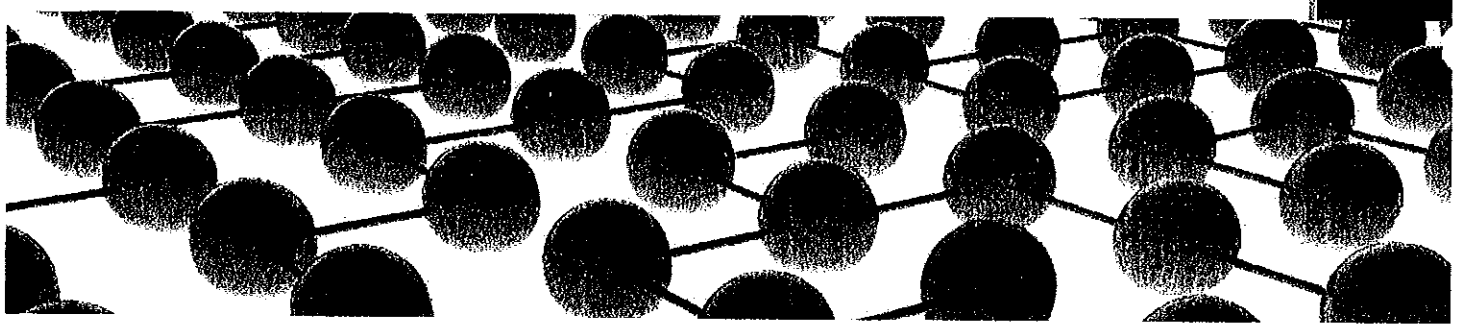

USING AN HD-2/TRANSLATOR TO CREATE YOUR OWN RADIO CLUSTER

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SCENE-SETTING

The coalescing of HD (Hybrid Digital) technology around the Ibiquity Digital system in 2000 and the December 6, 2005 formation of the Digital Radio Alliance established the ground rules and groundwork for the rollout of HD radio in the United States. With a membership comprised of major group owners Bonneville International, Citadel Broadcasting, Clear Channel Radio, Cumulus, Emmis Communications, Entercom, Greater Media, and Infinity Broadcasting (plus the Beasley Broadcast Group that joined soon after) the Alliance sought to coordinate HD's advancement including the lobbying of auto manufacturers to incorporate reasonably priced HD receivers as standard equipment in their vehicles (Scherer, 2006).

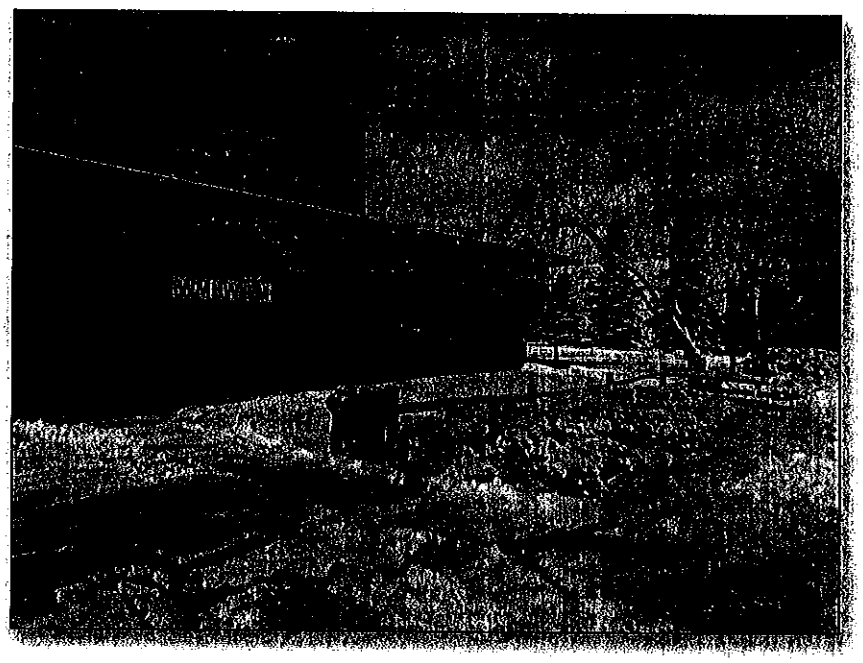
In the ensuing five years, the rollout of HD has been slower than expected. Still, with better and lower-cost HD receivers entering the marketplace, and the FCC's 2010 approval of higher power for HD transmissions to provide coverage patterns more closely equivalent to stations' analog signals, HD's prospects are gradually improving.

Some key broadcasters are not waiting for better HD receiver penetration before marketing their HD-2 programming and leveraging its assets. Instead, they are acquiring low power FM translators and using these to locally rebroadcast their HD-2 service on the analog band. In 2008, Cumulus was the first to use an HD-2/ translator combination to carry its Urban AC second service in Harrisburg, Pennsylvania and has adopted similar strategies in both Atlanta and Kansas City. In Atlanta, for instance, Cumulus is employing a translator at 97.9 to reincarnate its old 99X modern rock format to which its main signal was formerly devoted (Ross, 2010). Meanwhile, Saga Communications has been especially active in building HD-2/translator pairings at several of its clusters and other HD-utilizing station groups are acquiring translators to follow the same strategy, sometimes even trading full-power AM stations for FM translators. In several pronouncements, the FCC has found this translator use to be entirely proper. For example, in a decision released on May 3, 2010, the FCC's Audio Bureau dismissed a complaint by ROI Broadcasting against Saga Communications

of New England by reaffirming that "there is no prohibition on FM translator stations rebroadcasting the station's FM2 or FM3 digital programming stream" [See *Saga Communications of New England, LLC.* Memorandum Opinion and Order , DA 10-764 (rel. May 3, 2010)].

THE OPPORTUNITY

These technical, legal and strategic developments in HD radio's use of translators not only provide a new area of inquiry for radio students, but also forge a unique opportunity for standalone campus-based radio stations to transform themselves into fully functioning radio clusters. Once the existing campus station upgrades to HD, and begins to program a second service, acquisition of an analog translator constitutes an additional over-the-air offering that affords radio students the experience of creating and marketing two separate and broadly accessible formats. Possibilities for translator procurement are enhanced by the fact that, as long as it continues to operate as a noncommercial entity, the outlet is not limited to placement on the reserved FM band. Instead, this HD-2 carrying service can occupy an available frequency on the commercial spectrum as well.



Granted, a station's HD-2 service can be distributed on the Web and is automatically available on the still relatively small number of HD receivers. But the capability to put this signal on the analog band immensely increases the visibility of the format, converting it into a true "local" station that can be operated and promoted as such.

THE WMHW-FM CASE STUDY – CONSTRUCTION PHASE

Central Michigan University's School of Broadcast & Cinematic Arts converted its WMHW-FM to HD operation in February, 2008. Radiating a little over 9,000 watts, the station enjoys a multi-county reach. But with an HD receiver penetration of less than one percent in primarily rural mid-Michigan, the block-programmed HD-2 signal could potentially reach only a miniscule audience --- even when online streaming listenership was counted. Not surprisingly, it was therefore difficult to excite students about working on the HD-2 side of the station and there was zero interest on the part of potential underwriters in donating to a service that was like the proverbial tree falling in the deserted forest. In short, HD-2 was little more than a walled-off laboratory exercise within an otherwise high-profile station that prides itself on being "a professional operation that happens to be run by students."

Enter Ed Christian. The founder and CEO of Saga Communications, Ed had immediately grasped the programmatic and public service value of HD-2/translator combinations and, as indicated earlier, has made Saga one of the leaders in exploitation of this delivery configuration. Mr. Christian also holds academic rank as a distinguished adjunct professor within

the School of BCA. In 2009, he approached his School colleagues with a plan for making WMHW-FM's HD-2 service translator enabled. The training and local public service advantages of the project were readily apparent. It was then a matter of bringing the plan to fruition.

Fortunately, a translator license at 90.7 was becoming available in Mt. Pleasant (Central Michigan University's home city) as its operator was leaving the market. Acquiring an existing license rather than filing for a new one is a much more rapid process as new license applications must generally wait for an FCC filing window. The current window closed in 2003. Further, with the recent passage of the Local Community Radio Act that eliminated 3rd channel interference protection for incumbent FM stations, applicants for new FM translators may well be subjected to many more competing requests for spectrum space from self-standing LPFM applicants – particularly in urban areas.

In CMU's case, Mr. Christian provided the funds to obtain the assets of the departing translator operator and also donated the services of his consulting engineer to plot the technical data for relocating the transmission point to an existing tower on the Central Michigan University campus. Meanwhile, the School of BCA's other distinguished adjunct professor, Dr. Larry Patrick, donated his brokerage services to handle the transaction with the previous licensee. (A former NAB vice president, and past president of BEA, Larry's Patrick Communication is recognized as one of the top broadcast brokerage firms in the country.) The third member of the translator project team was WMHW's longstanding communications attorney, Alan C. Campbell of Fletcher, Heald and Hildreth. As legal counsel who helped "birth" the station in 1972, Alan was so intrigued by the project's potential for the station and its students that he offered to donate his services to advance the effort. Obviously, the School of BCA was lucky to be able to assemble such a high level and dedicated brain trust whose pro bono services proved absolutely invaluable. Other campuses exploring an HD-2/translator project initially need to estimate license acquisition options and costs that include such outside expertise.

Project feasibility analysis requires several steps. First, determine if an existing translator license may be available in the area. If the active facilities are not already known, it is easy to scan the dial to detect operating translators. Under FCC regulations, translators must air their specific call sign a minimum of three times per day: once between 7 AM and 9 AM, once between 12:55 PM and 1:05 PM, and once between 4 PM and 6 PM. This call sign begins with a letter (a W or K like the east/west delineations of "regular" stations) followed by three numbers indicating channel position and two more letters that are randomly assigned by the FCC. (Thus, WMHW's translator call is W266BU.) A search of the FCC's data base will also ascertain if the Commission has granted any CP's (construction permits) for facilities not yet built. In some cases, the holder of the CP may no longer be actively interested in pursuing a build-out and be open to negotiations for CP purchase. If an existing license or CP is not available, it is recommended that a consulting engineer be brought in to determine if there are any local spectrum vacancies that could accommodate a new translator operation. Again, keep in mind that the search need not be restricted to the reserved (noncommercial) band. A noncommercial station is allowed to operate its HD-2-carrying translator on the commercial band as long as the service adheres to the rules for noncommercial programming.

Ideally, an existing translator license or CP is available for sale and negotiations can be started with the owner. Because WMHW was fortunate to have a top broadcast broker as an adjunct faculty member, these negotiations were efficiently conducted. However, it is certainly possible for appropriate campus officials to

work with the potential seller. In some cases, the college development officer may be able to structure a tax deduction donation package that the seller would find valuable once a fair value of the license or CP is arrived at. As your station communications counsel will need to be brought into this project at some point in any case, she/he can help determine this value if a broker is not being utilized. If, however, there is no existing license or CP that can be obtained, it is important that a consulting engineer locate the best available vacant channel and that the application process be started. The FCC sets filing windows for such new facility applications and this can result in a lengthy wait.

WMHW was fortunate that a license at 90.7 was available and allocated to a willing seller. Broker Patrick then negotiated the asset sale and attorney Campbell secured FCC approvals for an asset transfer and construction permit once Ed Christian's consulting engineer had prepared the technical specifications for the relocated facility. The project was proceeding smoothly.

Then a glitch developed. Anyone contemplating this sort of project must understand that the many moving technical and legal parts can break down and repairs must be configured – often with very little lead time. In the case of WMHW, the glitch involved a broadcaster to the north who, seeing the application notice filed with the FCC, indicated he would contest it because the relocated translator as reconstructed by WMHW would be more powerful than the previous owner's 90.7 operation and interfere with his planned facility upgrade. Whether or not his challenge would have been successful, it inevitably would have caused significant project delays and additional legal expenses. Even though WMHW's attorney was donating his services, this was not an acceptable scenario. Fortunately, the station's consulting engineer had located a spectrum vacancy at 101.1 that could still provide the county-wide coverage pattern being sought. The engineer prepared new specifications covering that dial location and the attorney prepared the appropriate FCC filings that ultimately led to the relocation of the existing translator license from 90.7 to 101.1. There were several intermediate steps involved in this process too lengthy to detail here. Suffice it to say that it is vital that highly competent technical and legal resources are enlisted to determine and gain approval for unavoidable project modifications.

THE WMHW CASE STUDY – OPERATIONAL PHASE

Following the FCC's grant of a CP, the bow-tie antenna for the new translator was hung on the tower in late April, 2010 and, after authorized field testing, a license obtained from the Commission in May. With the Spring Semester just concluded, this was not the time to promote the new 101.1. As the launch of a new station with a new format presents a major programming and promotional challenge and opportunity, it would be wasteful to undertake such a launch when so few student staffers remained in town to benefit from the experience. Therefore, for the next three months the station operated quietly without any fanfare while its Triple-A (album adult alternative) format evolved.

WMHW's main signal at 91.5 (its HD-1 product) had long broadcast a modern rock service to listeners in the several counties its footprint covers. Skewing 12-24, the station reaches an underserved demographic in the region and most of its student staff are within its target age group. The genre of "91-point-5, Where Music Begins," is therefore familiar to student programmers who are well within their comfort zone in making playlist decisions.

However, it is important that radio students get practice in moving beyond these comfort

zones and learn to program for other audiences. With its 25-49 focus, the Triple-A HD-2 signal that the translator was now bringing to a county-wide audience provided just such an instructional challenge. In addition, the less edgy Triple-A format seemed more appropriate to in-store listening and presented enhanced underwriting prospects.

As the new translator's character took shape over the summer, plans were laid for a broadbased promotional launch once Fall Semester began and new and returning staffers were in place. Immediately after Labor Day, students hit the streets to introduce "Mountain 101 – The Summit of Sound" to the community. Remotes complete with free pizza (from a charter underwriter) and other giveaways were staged downtown and at area parks. The local newspaper did a feature story on the new station and magnets featuring the station's logo and dial location were passed out to area businesses. The HD-2 outlet began to build its own on-air and executive staff separate from the WMHW's HD-1 and a distinct identity was forged. From a facilities standpoint, Mountain 101 operates from its own on-air studio next to that of its big sister to provide a logistical reminder of its separate but equal status.

Initially, the plan was to have the translator station serve as a training ground for students who would then move up to the multi-county-reaching HD-1. But in talking with key commercial broadcasters, it became clear that this was an inhibiting strategy that did not allow students to move back and forth between the two outlets and thereby acquire more broad ranging experience in operating a two-station cluster. Even though 101.1 has only been up and running for a few months, this redirected approach has already borne fruit with both novice and advanced staffers learning differentiation techniques vital to the success of today's multi-channel radio operations.

The Mountain's older skew has also brought financial dividends. The format is already the sound of choice in many area businesses whose owners and clientele match its target age group. This positive exposure has, in turn, resulted in underwriting contracts with additional businesses whose marketing objectives did not align with the big station's modern rock image and sound. Budding account executives are now learning how to market two stations separately or in tandem— experience that will serve them well in their future sales careers. In summary, radio students in the School of Broadcast & Cinematic Arts are acquiring valuable in-house experience in all phases of cluster operation, area businesses have a new and cost-effective vehicle for promoting themselves, and listeners in Isabella County can enjoy a new sound that they do not need a computer or HD receiver to access.

To monitor and compare the program services of WMHW's modern rock 91.5 (HD-1) and Mountain 101 (HD-2) incarnations, simply visit www.wmhw.org and click the appropriate station button. Keep in mind that both stations are entirely the product of student volunteer staffers. A full-time faculty operations manager oversees the two facilities, but from station managers on down, all other positions are filled by unpaid students excited about learning the evolving radio craft.

Building an HD-2/translator operation has not been easy. But the result has been well worth the effort. The 38-year-old WMHW has been reinvigorated by its new offshoot and the students serving on both 91.5 and 101.1 are coming to understand how a contemporary radio cluster can internally be both competitive and cooperative.

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