

*In the matter of: Amendment of Part 73 to Permit Permanent Licensing of AM
Synchronous Booster Stations (RM — 11779)*

Comments of Timothy C. Cutforth P.E. January 15, 2018

The docket to consider allowing AM Booster stations to be permanently licensed should be folded into the discussion of AM Revitalization as it is one of the KNOWN technologies that can provide improved AM service to the public.

FM station licensees have been allowed to use permanently licensed booster stations to provide improved service to the public for over 30 years. In the case of FM Boosters the licensee has been allowed to license a booster anywhere within the primary service area at his own discretion. Recent improvements in technology has allowed true synchronization of both the carrier frequency and the modulation down to the HD digital stream when so desired.

AM licensees have been limited to short term demonstrations of the technology of Booster synchronization with no foreseeable hope of being allowed to use a licensed booster to serve the public with an improved signal even though the booster technology has been demonstrated multiple times to be functional over the last 30 years in multiple situations. I have personally designed and installed synchronous boosters involving daytime fill in of coverage and fill in of nighttime coverage within the daytime coverage all with excellent results. Each dramatically demonstrated improved area and population receiving service and would have been a long term benefit to the public if the FCC had been willing to license it.

It would appear on the surface that the FCC does not believe that an improved service to the public through the use of booster technology is of interest when it comes to AM broadcasting even though the FCC has announced to the world that AM radio is languishing and in need of revitalization.

Respectfully submitted,

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