To Whom it may concern at the FCC,

Concerning the rule making to allow or encourage broadcasters to go all digital, I am firmly AGAINST this move. The problem with the AM band is not digital, if anything digital has added to the issues of AM. There are two major issues with AM radio today

1. Massive interference created by cheap electronics that have flooded the US market. The FCC is supposed to police these issues of interference from consumer products, but due to the cost cutting measures with the Federal government, the FCC is too understaffed to study and enforce the rules on the books governing interference to any broadcaster. LED lights, CFLs, computer switching power supplies are among the chief interference to the AM band. The only way to fix this is to allow a power increase for local stations. Digital will not get over the noise any better than analog will.
2. The other issue with AM today is horrendously terrible cookie cutter programming that has run people off from the AM dial. The bad programming started when NRSC was forced upon the stations, and the stations followed suit by dumping music and other creative formats for talk. If the NRSC was lifted, and stations allowed to wideband the audio to at least 12khz audio fidelity, then the AM band could come back as a proper medium. Also the FCC needs to regulate the receiver industry and require that all AM receivers made for the US market be capable of at least the 10 khz NRSC standard of today. I have measured in current radios 3khz roll off, and no one will listen to anything that sounds that poor.

Digital radios for AM are less than 10 percent of the auto radio market. Car radio listening is 90% of the current listening by local listeners. Yet 90% of car radios have analog AM receivers. There have been AM radios manufactured for and in this country since 1919. We will be relegating millions of radios and listeners to nothing if digital only radio is encouraged. How can these stations be a “service to their communities” if no one can receive them? In today’s world no one will go buy a digital receiver for their home or car, they will simply move completely away, and listen to a stream.

This is completely a waste of time for the FCC, and a waste of time for the broadcasters. The only thing digital only will achieve is a higher electric bill at the transmitter, and a great deal of sales for Nautel digital transmitter (of Canada).

As the licensee of KFRO and KZEY, please do NOT pass this measure for digital only AM, it will be the surest way to kill AM. If you want to fix AM, allow local stations to go to 5kw, recall NRSC, and regulate the car radio receivers. Once those things are done the broadcasters have the tools to succeed.

Sincerely

Scottie Rice

President RCA Broadcasting, LLC (KFRO/KZEY)