

Before the  
FEDERAL COMMUNICATIONS COMMISSION

Washington, D. C. 20554

In the Matter of: )  
)  
Petition for Rulemaking to Allow the MA3 )

All-Digital Mode of HD Radio for AM    )           RM-11836  
Stations                                        )  
   )  
Revitalization of the AM Radio Service    )

Comments of Mendenhall Engineering, LLC

Mendenhall Engineering, LLC believes that HD Radio<sup>®</sup> MA3, all digital, (non-hybrid), modulation mode, in the medium wave band offers AM broadcasters the opportunity to greatly improve the delivery of all types of programming (speech and music) to their service communities. The medium wave band has suffered a significant increase in the noise floor from many types of non-licensed devices over the past 20 years which has made analog AM modulation much less effective in serving communities dependent on AM broadcast services.

There is already a significant installed base of HD Radio<sup>®</sup> receivers (especially in automobiles) now in the hands of consumers. All of these receivers can now receive all modes of both FM and AM transmissions, including the non-hybrid, all digital modes including MA3.

The HD Radio<sup>®</sup> MA3, all-digital, mode has been sufficiently tested for coverage effectiveness and for interference potential to allow more AM broadcasters to gain experience with it.

If an AM broadcaster feels that there are a sufficient number of HD Radio<sup>®</sup> receivers in the service area to be economically viable, the broadcaster should be permitted to switch from analog AM to the all-digital HD Radio<sup>®</sup> MA3 modulation mode. Allowing AM broadcasters to switch to all digital mode will not negatively impact other adjacent broadcasters who wish to continue to operate in analog AM modulation mode.

Respectively Submitted,

Geoffrey N. Mendenhall, P.E.

Principal - Mendenhall Engineering, LLC

May 10, 2019