

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

	)	
In the Matter of	)	
Revitalization of the AM Radio Service	)	MB Docket No. 13-249
Petition for Rule Making to Allow the MA3	)	
All-Digital Mode of HD Radio for AM	)	
Stations	)	
To: The Commission		

**COMMENTS OF COMMUNICATIONS TECHNOLOGIES, INC.**

Communications Technologies, Inc., (CTI), herein submits its Comments in support of the Bryan Broadcasting Corporation (“BBC”) Petition for Rulemaking requesting that the FCC initiate a proceeding to authorize the MA3 all-digital mode for all interested AM stations.

**Introduction**

CTI is a broadcast engineering consulting firm located in Marlton, New Jersey. The firm was established in 1985 and has clients who are both commercial and non-commercial licensees of AM, FM and TV stations throughout the United States. The Radio Frequency (RF) portions of Rule Making and applications filed by clients with the FCC are regularly completed by CTI. Throughout its history the firm has been active in AM Broadcast Engineering including assisting clients in the filing of Comments and Reply Comments in this proceeding and in MM Docket No. 87-267, the Commission’s last comprehensive review of the regulatory areas which affected the AM Service.

It is believed accurate to state that, in great part, we are living in a digital world. We receive notices from our local police on our smart phones advising us of traffic and safety issues, the quickest access to up to date hourly and emergency weather is typically on our cell phones. The FCC is highly supportive of 5G technology and the implementation of ATSC 3.0 in our DTV industry. All of these over the air technologies and services compete with broadcasters.

In this environment, it seems obvious that AM Broadcasters must find ways to deliver more than program content; ancillary information services are also necessary and only an all-digital transmission service is believed to have the ability to do that in the standard broadcast band.

## Recommendation

Giving up a stations analog audience has to be a daunting decision for a station owner given that HD Radio receiver penetration has not reached 50% in any known market at this time. It is suggested that the FCC create an incentive for the first 250 AM stations who file, construct and operate all digital facilities continuously for a period of three years. That incentive would be allowing those stations to operate with their analog power levels and antenna patterns under permanent license.


Typically VHF and UHF digital radio and TV transmission services have found that the analog coverage area can be obtained with less power. Should that occur in the AM MW band grandfathering the first stations at higher power might prove an excellent incentive - the kind of incentive that would give all digital HD radio in the AM band a fighting chance at flourishing.

## Conclusion

We thank the Commission for considering this proposal to take the AM band to a new level of performance and service to the public.

Respectfully submitted,

Communications Technologies, Inc.



By: \_\_\_\_\_

Clarence M. Beverage



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Laura M. Mizrahi

May 11, 2019