

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

In the Matter of	)	
	)	
Petition for Rulemaking to Allow the	)	RM-11836
MA3 All-Digital Mode of HD Radio	)	
for AM Stations	)	
	)	MB Docket No. 13249
Revitalization of the AM Radio Service	)	
	)	

**COMMENTS OF CROMWELL GROUP**

Cromwell Group, Inc. hereby submits comments in full support of the above-captioned Petition for Rulemaking (the “Petition”) filed by Bryan Broadcasting Corporation (“BBC”) to allow AM stations to convert to “all digital”.

When the idea of allowing AM stations to rebroadcast on FM translators was advanced many predicted it as a first step to improving AM and an all-digital service. The thought was that listeners had FM radios and would readily enjoy and accept the programming currently provided by AM service. On the FM translator there would be continuity of local community service.

A next phase would be the conversion of AM station to all-digital. The community use of the AM programming would continue to be available on FM without adding equipment. Then when the AM station changed to digital, the public would not immediately need a digital radio, i.e., an orderly transition.

The Bryan Petition seems to suggest the above-described second phase for AM service.  
For that reason, Cromwell Group, Inc. whole-heartedly recommends this proposal.

Respectfully submitted,

**Cromwell Group, Inc.**

A handwritten signature in black ink, appearing to read "John F. Garziglia", written over a horizontal line.

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John F. Garziglia  
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Its Attorneys

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May 13, 2019

## **CERTIFICATE OF SERVICE**

I, Rebecca Jacobs Goldman, hereby declare that a copy of the foregoing comments were sent via email, this day, May 13, 2019 to the following, as required by section 1.405 of the Commission's rules:

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Rebecca Jacobs Goldman