

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

In the Matter of	)	
	)	
Petition for Rulemaking to Allow the	)	
MA-3 All-Digital Mode of HD Radio	)	RM-11836
for AM Stations	)	
	)	MB Docket No. 13249
Revitalization of the AM Radio Service	)	
	)	

**JOINT COMMENTS OF THE CALIFORNIA AND**  
**MISSOURI BROADCASTERS ASSOCIATIONS**

The California and Missouri Broadcasters Associations (the “Associations”) submit these joint comments pursuant to Section 1.405 of the Commission Rules in support of the above-captioned Petition for Rulemaking (the “Petition”) filed by Bryan Broadcasting Corporation to initiate a rulemaking proceeding to authorize voluntary transition to the MA-3 All-Digital Mode of Operation for AM broadcast radio stations. The Associations urge the Commission promptly to issue a notice of proposed rulemaking to allow a transition by AM licensees to MA-3 All-Digital operation on a voluntary basis under an expedited, simplified elective process.

The Associations have been monitoring the progress and observing the results of experimental and demonstration projects implementing all-digital AM operation since the early 2012 field tests. Of all the various proposals for revitalization of AM broadcasting considered and adopted since the first notice of proposed rulemaking in Docket 13-249, voluntary MA-3 service mode for all-digital AM broadcasting may prove to be the most effective and useful.

In the initial notice in Docket 13-249, the Commission noted the critical need to enhance AM broadcast quality so that AM broadcasters may better serve the public to advance the Commission’s fundamental goals for localism, competition, and diversity in broadcast media.

Despite the many forms of media that have come along in the last fifty years, AM radio remains an important source of broadcast entertainment and information programming, particularly for locally oriented content. Many AM broadcasters continue to provide unique, community-based programming that distinguishes them from other media sources in an increasingly competitive mass media market.<sup>1</sup> This local focus and community service was recently emphasized in an article from POLITICO Magazine titled “The Lo-Fi Voices That Speak for for America.”<sup>2</sup>

POLITICO reports that even today in 2019, thousands of AM stations remain on the air “many of them thriving - in part because they service unique sets of people whose voices aren’t always heard loudly.” AM makes ownership “more accessible to people of color, immigrants, non-English speakers and those with political views outside the mainstream.” On the technical side, POLITICO notes that AM radio is not restricted to line-of-sight reception and can cover vast geographic areas, making it a useful staple for rural America. AM’s utility to diverse and minority audiences is demonstrated with specific station examples of AM radio programming that serve diverse populations including a minority oriented Baltimore, Maryland station serving the city’s neighborhoods with community oriented discussion and opinion, a Navajo language station in Arizona, a rural station in Nebraska serving the farm community and a Cajun culture station in the Louisiana outback, among others.

This local service capability is important to the citizens of our states. For example, of 268 California AM radio stations, 34% serve specific minority communities, including 33 Spanish language, 13 Asian format, 4 Korean format, 21 Asian or South Asian format and 20 stations programmed “Mexican” as distinguished from Spanish. Notably, 41 of those stations, 15%, are located outside all markets.

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<sup>1</sup> Revitalization of the AM Radio Service MB Docket No. 13-249 (2013)

<sup>2</sup> Zack Stanton, “The Lo-Fi Voices That Speak For America,” POLITICO (April 27, 2019) available at <https://www.POLITICO.com/interactives/2019/magazine-am-radio-still-matters/>.

Missouri residents are served by 114 AM radio stations located either in Missouri or a border state, of which 67, or 59%, are located outside all rated markets, providing service to rural farm market audiences.<sup>3</sup>

In 2013, Chairman Pai, then a Commissioner, addressed the Missouri Broadcasters Association with these comments:

. . . I was reminded of the critical role that broadcasters play when disaster strikes. When severe weather threatened central Oklahoma, local radio and television stations warned residents to take cover. Those warnings saved more than a few lives when an EF-5 tornado barreled through the Town of Moore [Oklahoma] . . . the tragedy in Oklahoma probably brought back memories of a catastrophic tornado in Joplin just a little over two years ago. In the wake of the Joplin tornado, the mobile phone service and the internet were all but wiped out, broadcasters led by KZRG AM 1310 provided around the clock uninterrupted coverage for nine consecutive days. KZRG told residents how to get disaster relief and it connected people in need with people who could help. . . .

The story of KZRG demonstrates the importance of AM radio in times of crisis. But AM radio plays an important role in towns throughout the United States every single day. AM stations cover local politics and host debates about local issues. They cover community events such as high school sports, and they reach out to all parts of society and programming targeted to minorities, people who speak foreign languages and the elderly, among others. We all know that AM broadcasters today face a lot of challenges. Statistics tell the story. In 1978 half of all radio listening was on the AM dial. In 2010 that number was only 17%. . .

Based on my own experience, AM signal quality seems to be a major factor. Due to widespread interference, it seems tougher, each day, to receive a clear AM signal. So to address these challenges, I proposed last year that the FCC launch an AM radio revitalization initiative. . . . And what about the long term future of the band? Should our goal be to transition AM stations to all-digital . . . ?

The Associations have thought about it and the answer is YES! Here's why.

The NAB field tests of all-digital in-band on channel AM radio demonstrate that MA-3 all- digital provides greater coverage, more data capacity and less interference.

The NAB tests demonstrate that all-digital AM provides superior audio quality that compares well to FM stereo reception. Test results showed that the daytime signal provided

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<sup>3</sup> All data taken from current BIA Media Access Pro database.

solid coverage well beyond the .5 mV/m analog contour on most of the test routes. Nighttime also provided solid all-digital coverage well beyond the .5 mV/m analog contour. Indoor performance, as well, was good within the .5 mV/m analog contour.

Reports from NAB Labs suggest also that all-digital on AM offers several important benefits and improvements over the legacy analog mode. In addition to better audio quality and as-good or better daytime coverage than the analog-only, very significantly, MA-3 yielded more immunity to noise and interference. Furthermore, troublesome first-adjacent-channel interference is all but eliminated with the reduced-bandwidth MA-3 mode of all-digital.<sup>4</sup>

The principal drawbacks to all-digital AM radio are considered to be three points:

- All-digital signals are not receivable on analog only radios.
- The cost of conversion; and
- All-digital is not authorized by the FCC.

New data from Xperi shows that the receivers are now out there. Its data reveals that the number of HD radio equipped cars in the U.S. is growing almost exponentially to a total of over 50 million HD receivers equipped cars in 2018 and over 9 million are being added annually.

Xperi has also provided data to demonstrate that the cost for converting an analog AM station is now down from about \$45,000 for GEN II in 2002 to around only \$12,000 for current GEN IV equipment.

It seems that the only remaining obstacle to AM All-Digital operation is the need for FCC authority to make a voluntary conversion for those broadcasters who believe their communities will be better served and who wish to make the transition.

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<sup>4</sup> Thomas R. McGinley, "NAB Tests Address Digital AM Concerns," Radio World (May 25, 2016) available at; <https://www.radioworld.com/news-and-business/nab-tests-address-digital-am-concerns>

## **CONCLUSION**

The Associations strongly support the Bryan Broadcasting Petition to allow the MA-3 all-digital mode of HD radio for AM stations. It has been tested and, as Bryan Broadcasting stated, it works. FM translators for AM stations have worked wonders for providing an AM station's programming to the smaller portion of the AM station coverage area that can be served by the translator, but service to the broader full signal contour of most AM radio stations will be improved only by providing the opportunity to voluntarily adopt the MA-3 all-digital mode for AM broadcasting. We urge the Commission to promptly issue a notice of proposed rulemaking, gather the facts and swiftly move to regular authorization of MA-3 AM all-digital on a voluntary basis.

Respectfully submitted,

CALIFORNIA BROADCASTERS ASSOCIATION  
MISSOURI BROADCASTERS ASSOCIATION



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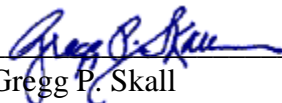
## CERTIFICATE OF SERVICE

I, Gregg P. Skall hereby certify that on this 13th day of May, 2019, a copy of the foregoing Joint Comments Of The California And Missouri Broadcasters Associations was served on the following parties by first-class mail, postage pre-paid (acceptance otherwise indicated below) and by e-mail:

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Gregg P. Skall