

**Before the  
Federal Communications Commission  
Washington, D.C.**

**In the matter of:**

<b>Petition for Rulemaking to Allow the</b>	)	
<b>MA3 All-Digital Mode of HD Radio</b>	)	<b>RM-11836</b>
<b>for all AM Stations</b>	)	
	)	
<b>Revitalization of the AM Radio Service</b>	)	<b>MB Docket No. 13-249</b>

**COMMENTS OF CARL T. JONES CORPORATION**

Carl T. Jones Corporation (“CTJC”), a communications engineering consulting firm, hereby submits comments in the above captioned Petition for Rulemaking filed by Bryon Broadcasting Corporation (“BBC”) to allow AM Stations to use the MA3 All-Digital Modulation Mode on a voluntary basis (“BBC Petition”). CTJC provides technical consulting services to AM broadcasters including supporting development of new and improved transmission technologies. CTJC and its predecessors have been engaged in these endeavors continuously since 1935.

We are in agreement with BBC that the accelerated increase in noise level that has occurred in the AM frequency band over the last several decades has significantly impaired the audio quality of the received signal over large portions of an AM station’s coverage area. This in turn has resulted in a diminished ability of the AM broadcaster to compete with other audio services available to the listener and is a major reason for the erosion in AM radio listenership. The increase in noise level is well documented and is the central reason for many of the proposed rule changes in the ongoing AM Revitalization Proceeding.

The BBC Petition proposes that the Commission allow use of the MA3 All-Digital Modulation Mode as an optional tool for the AM broadcaster due primarily to the ability of the all-digital modulation mode to deliver a pristine audio signal in the presence of high noise levels. We support the BBC Petition for several reasons: 1) the HD Radio MA3 All-Digital operating mode is a proven technology as demonstrated by the NAB PILOT program test results; 2) there is an existing base of receivers in place that can receive the All-Digital AM signal; 3) the adoption of rules that would allow use of this technology would be complimentary to other proposed changes in the AM Revitalization Proceeding; and 4) an early conversion to all-digital broadcasting by a small number of AM stations on a voluntary basis may be just the catalyst needed at this critical time to further a technology which would allow AM stations to overcome the devastating impact of ever-increasing noise levels and thereby further Commission's goal of revitalizing the AM radio service.

For the reasons stated above, we encourage the Commission to open a proceeding on the BBC Petition and we look forward to seeing comments from other broadcasters and engineers on the use of the HD Radio MA3 All-Digital Modulation Mode.

Dated: May 11, 2019

Respectfully Submitted,



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