

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20024

In the Matter of:

Petition for Rulemaking to Allow)	RM-11836
the MA3 All Digital Mode of)	
HD Radio for AM Stations)	MB Docket No. 13-249
)	

To: The Commission

COMMENTS OF KEVIN M. FITZGERALD

1. Kevin M. Fitzgerald, (hereinafter “Petitioner”), pursuant to Section 1.401 of the Commission's Rules, respectfully presents Comments to the above captioned Petition for Rulemaking (the “Petition”) filed by Bryan Broadcasting Corporation (“BBC”) to initiate a proceeding to authorize a voluntary transition to the MA3 all digital mode of HD Radio(TM) operation for AM stations. The Commission should promptly issue a Notice of Proposed Rulemaking to facilitate the transition to all digital broadcast operation in the AM Band and simplify the application and approval process.

2. The petitioner here is a consulting engineer for numerous AM and FM stations predominantly in Northeast PA and Southern New York, is the Director of Engineering for Times-Shamrock Communications in Scranton, PA, and is a General Partner of Geos Communications, the Licensee of WGMF, 730AM, Nanticoke, PA and WZMF, 1460AM, Tunkhannock, PA. The petitioner has worked with numerous AM facilities for over 40 years. Additionally, the petitioner has worked with and helped install HD Radio to numerous FM stations.

3. The current HD Radio system has had a chance to mature and become successfully deployed at many stations across the country. There are now over 55 million radio receivers in the field that can receive HD Radio. This number is growing

rapidly as HD Radio is now often a standard feature in new vehicle models. The vast proportion of these radios (in excess of 50 million radios) can pick up the MA3 All Digital mode of AM radio broadcasting.

4. The MA3 All Digital Mode of AM Radio Broadcasting has now been well tested at numerous facilities around the country with excellent results. In particular, the petitioner has listened to the test at WWFD, 820AM, Frederick, MD. The petitioner spent the better part of a day in March 2019 listening to the WWFD signal from the PA border, down around the Baltimore Beltway, down to Annapolis, MD. The results are truly excellent. The quality of the signal and the audio quality of the station are impressive to say the least. The signal is clear, in somewhat far away locations where fading of the signal is expected. It seems that in reviewing other tests of the MA3 All Digital Mode; the results were all impressive and positive.

5. The petitioner is the General Partner of Geos Communications, the licensee of AM station WGMF, 730, Nanticoke, PA. WGMF is fortunate to be in operation with the help of 3 FM Translators, providing service to much of its 2 mV/m coverage area. In light of this WGMF is in the unique position of being able to go all digital with the ability to continue analog FM translator service. As such, Geos Communications is interested in using the MA3 All Digital Mode of HD Radio as soon as it is allowed by the Commission.

6. Numerous other AM stations in the Northeast PA and Southern NY areas also have one or two FM translators in operation. A number of these stations would have a great interest in the MA3 All Digital Mode of HD Radio because much of their audience already can receive the stations via an FM translator.

7. The time is now for the Commission to take the next step in its effort to revitalize the AM band by adopting rules to facilitate and hasten the inevitable transition to an all-digital future. The Commission should promptly issue a Notice of Proposed Rulemaking to facilitate the transition to all-digital broadcast operations in the AM band.

Respectfully submitted,

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5/13/2019