

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

In the Matter of:

Petition for Rulemaking to Allow the MA3  
All-Digital Mode of HD Radio for AM) RM-11836  
Stations

MB Docket No.  
RM 11836

Revitalization of the AM Radio Service

MB Docket No. 13-249

**Comments of Digital Radio Mondiale (DRM)**

Bryan Broadcasting Corporation (“BBC”) filed a petition for rulemaking urging FCC to authorize the MA3 all-digital mode of HD for any electing AM station in the USA.

We in the global not-for-profit Digital Radio Mondiale (DRM) Consortium agree with BCC that “all-digital systems represent the future of AM radio” but would like to see the testing and adoption of digital beyond HD and extended to Digital Radio Mondiale.

While BBC advocates MA3, admitting that this is based on a trial with less than perfect results (differences from analog coverage exist and reception “generally manages to replicate it”), we would like to urge FCC to also allow DRM testing and ultimately elective adoption of best digital technology for AM.

A recent article in Radio World, “Finally a Solution to the AM Problem”, it was suggested that DRM+ may be the answer. [Read more](#)

There are several reasons for this:

- DRM is the newest, most complete, open standard for digitising radio in **all frequency bands, and is recommended by ITU**. DRM has been devised as a direct heir to analog AM (SW, MW). It uses 9/10, 18/20 kHz bandwidth and has a useful content bit rate of up to 72kbps.
- DRM has been tested extensively all over the world delivering excellent quality in simulcast and pure DRM. Latest independent reports carried out in India (currently using 35 new DRM MW transmitters) can be found at:  
<http://prasarbharati.gov.in/R&D/>
- DRM works at much reduced energy costs while being compatible with the existing channelization and frequency plans.
- DRM is in direct succession to the analog AM (and FM) services, not owned or controlled by any single company and immediately available with full know-how and technology access by the transmitter and receiver industry.

DRM digital radio delivers in the **AM bands** significant benefits:

- **Power/energy efficiency (using SW or MW in DRM can reduce the power used up to 80%)**
- **Spectrum efficiency (more programmes can be broadcast on one single frequency used for one programme in analog)**
- **DRM, unlike analog, offers enhanced and stable audio quality that is FM-like (mono or stereo). DRM also offers multiservice data including Journaline (the enhanced text services, more information captured as RSS feeds or from other internet source), slideshows, multilingual text (practically being able to show any characters of any language not just Latin script), and the Emergency Warning Functionality (EWF) in case of disasters.**

Several countries all over the world are using DRM in mediumwave for domestic or international use. (Currently India is rolling out DRM in medium wave, being the largest digital roll-out in the world. Almost 600 million people are currently in the incidence of DRM signals broadcast by All India Radio using 35 medium wave transmitters of different powers).

With these benefits in mind, we believe that the DRM standard is worth testing and using as it would be most suited for the AM stations that want to maintain and increase both listeners and revenues.

Currently there are DRM receiver solutions (in contrast to the situation a couple of years back) and over 1.5 million cars on Indian roads have inbuilt DRM MW delivering excellent audio to the listeners.

Therefore, we urge FCC to take a wide view and consider all options including DRM, if AM is worth futureproofing in the USA.