



September 8, 2020

Marlene H. Dortch, Esq.  
Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington DC 20554

Re: Notice of Ex Parte Communication, MB Docket Nos. 19-311 and 13-249

Dear Ms. Dortch:

On September 4, 2020, David Layer of the National Association of Broadcasters spoke by telephone with James Bradshaw, Jerome Manarchuck and Christine Goepf of the Media Bureau, Audio Division, to discuss the Commission's recent Notice of Proposed Rulemaking (NPRM) to allow AM radio stations to voluntarily transition to all-digital broadcast operations.<sup>1</sup>

Specifically, Mr. Layer provided technical input on four specific topics: operating rules on power limits, all-digital AM RF mask requirements, potential interference issues associated with all-digital AM and proposed frequency tolerance standards, as follows:

- Mr. Layer indicated NAB's support for using average power measurements for establishing the correct station operating power for all-digital AM service, noting that this was the method used in the NAB Labs/PILOT testing as well as the method currently being used by experimental station WWFD;
- Mr. Layer supported use of the all-digital AM RF masks as proposed by Xperi;
- Mr. Layer referred to the numerous coverage maps obtained by NAB Labs/PILOT as well as those developed by station WWFD, noting that these stations have sufficient all-digital coverage without causing objectionable interference; and
- Mr. Layer urged the Commission not to impose a 1 Hz frequency tolerance on all AM stations, but agreed that it may be appropriate to impose this tolerance on only all-digital AM stations.

In support, Mr. Layer referred to two documents previously submitted into the record as well as to WWFD's latest request for extension of experimental authority.<sup>2</sup>

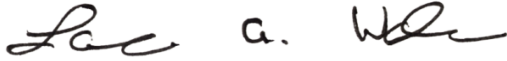
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<sup>1</sup> *All-Digital AM Broadcasting, Revitalization of the AM Radio Service*, Notice of Proposed Rulemaking, MB Docket Nos. 19-311 and 13-249, 34 FCC Rcd 11560 (2019) (NPRM).

<sup>2</sup> David H. Layer, *NAB Labs All-digital AM Test Project*, 2015 NAB Broadcast Engineering Conference Proceedings (2015); Comments of Nautel Maine, Inc., MB Docket Nos.

NAB appreciates the opportunity to help inform the Commission's deliberations.

Respectfully submitted,

Handwritten signature of Larry A. Walke in black ink.

Larry Walke  
Associate General Counsel  
Legal and Regulatory Affairs  
National Association of Broadcasters  
(202) 429-5430

cc: James Bradshaw

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19-311 and 13-249 (March 9, 2020); and WWFD (AM), *Request for Extension of Experimental Authority*, June 29, 2020.