

To the FCC:

I oppose ending protection of nighttime skywave coverage of Class A AM stations. As past experience with raising nighttime power levels of Class C "graveyard channel" stations has shown, allowing small local stations to increase nighttime power levels provides only a marginal improvement in coverage area, due to the corresponding increase in co-channel skywave interference.

The benefit to few local listeners would be more than offset by the loss of much larger population areas which could receive the skywave signals from the 50 kW Class A stations, especially in the aftermath of natural disasters when many smaller stations are off the air and TV, Internet, and mobile phone service is unavailable. Many listeners also use AM skywave reception to enjoy play-by-play broadcasts of distant sports teams without needing to pay for premium cable TV channels or satellite radio.

The proposed rule change also neglects to consider the impact of groundwave/skywave signal cancellation, which often renders nighttime reception in the fringe areas of a station's daytime coverage poor or unusable, due to the groundwave and skywave signals coming in simultaneously and cancelling each other out. This often creates a halo effect where listeners in a 50 to 100 mile radius of an AM station have poor nighttime reception, while more distant listeners who are receiving only the skywave signal enjoy far better reception. Thus, using an AM station's groundwave contour fails to provide an accurate representation of its actual useful nighttime coverage, even if the same power level and antenna pattern is used at night.

Also, any increase in power levels and/or loosening of antenna patterns of adjacent-channel stations should only be allowed if these stations do not transmit IBOC DAB / "HD Radio" digital signals. The AM band is already suffering the significant degradation caused by allowing nighttime IBOC use, and this problem must not be made any worse than it already is!

Small local AM stations who seek to add or improve their nighttime coverage would be much better served by the use of low-power FM translation stations. And at the very least, even if the full 76 to 88 MHz band is not opened up for FM broadcasting despite popular support for that idea, 87.7 and 87.9 MHz should be opened up for use by these translators, and also existing Channel 6 TV stations who are already acting as makeshift FM radio stations through their audio carrier on 87.75 MHz should be allowed to discontinue their visual signal and become legitimately licensed FM radio stations on 87.7 MHz.

Thank you for your time in considering my comments.

Regards,
Kevin Tekel