

RE: 13-249 ¶ 78

To the FCC;

I would like to express my gratitude to the FCC for allowing me to comment on the Notice of Inquiry for 13-249 ¶ 78 concerning better utilization of the expanded AM band.

Now that AM stations will be allowed to purchase and move or acquire through auction FM translators, more than likely the FM band will eventually be filled to capacity in most DMAs. As such, it would essentially spell the end for more LPFM stations.

However, this may be the best time to consider an LPAM service on the expanded band. Such a service was originally proposed under Docket No. RM-10803 in 2004. The NOI for 13-249 ¶ 78 specifically asks about different classes and power levels of AM stations that should be allowed on the expanded band. Establishing an LPAM service could be excellent way to efficiently use those expanded channels by providing an alternate service.

- LPAM stations can provide specialized programming services, those for audiences too small for full power radio stations.
- LPAM can provide minority groups with a means of mass communications.
- LPAM can be the voice of the people who can speak freely without worrying about a corporate owner's bottom line.
- LPAM can be local programming managed by local citizens.
- LPAM can provide a new training ground for future broadcasters who can move on to full power broadcasters.
- The original proposal called for a service that would mirror TIS in terms of engineering specifications. However, given the high degree of interference in today's environment it may be more beneficial to increase the input power to 25 or 50 watts instead of 10 watts. C-QuAM stereo is required of full power expanded band stations and such a requirement could remain in place for LPAM as well. (LPAM could, in time, also serve as a testing ground for all-digital AM similar to what Ofcom is currently doing in permitting low power stations to broadcast experimentally in DAB).
- *Secondary status.* Low Power AM stations would operate as a secondary service and would be required to protect full power daytime AM stations and any LPAM station which chooses to operate at night must protect a full power station's

nighttime service areas.

- *Eligibility.* The eligibility requirements for licensing in the LPAM service could be similar to the licensing in the LPFM service. However, given the challenges low power radio stations often face in surviving financially, it might be good to consider permitting small businesses to own no more than one station in a community and allowing a limited number of local-only commercials.

- *Channels available.* Potential LPAM stations would apply for channels between 1610 and 1700, using the interference model that currently applies to Travelers Information Stations, which can be found in §90.242(a)(2)(i). LPAM stations could propose operation on at least the third-adjacent channel to a local AM broadcast station and could choose a frequency that is not in another station's nighttime service area.

- *Output Power.* All LPAM stations would be limited to 25-50 watts total output power.

- *Antenna Systems.* LPAM antenna systems should be simple and compact. Directional antennas would not be permitted.

- *Co-channel interference.* Given the insurmountable obstacles to noise-free distant reception, many low-power stations can be stacked on channels without negative consequence to either incumbents or new service. Modern transmitter designs possess frequency-determining components of sufficient stability to avoid carrier beat frequencies resultant of many signals occupying the same channel. A local AM transmitter of modest power featuring well-processed, consistently high modulation can effectively obliterate co-channel signals to provide satisfactory local reception with negligible realized interference.

HOMETOWN PROGRAMMING

LPAM on the expanded band will permit hundreds of new 25-50 watt full-time AM stations featuring live-and-local home-town programming meeting the needs of the local communities they serve. Such a community-oriented service could, indeed, revitalize the AM band. Thank you for your time.

Sincerely,

Daniel Brown