

Forward:

It never ceases to amaze me of the so called solutions to our AM Broadcast problem. I'm sorry but what has happened is a National Disgrace. AM broadcast has a heritage that is deeply engrained in our nation from the original days of crystal sets and battery operated radios. The nation depended on AM Broadcast for everything from Grand Ole Opry nationwide to President Roosevelt's fireside chats during World War II to Kate Smith bolstering our spirits with "God Bless America" in those terrible times, AM Broadcast was there. With the dawn of FM Broadcast (which I have no problems with) the FCC and its pundits opened an all out assault against AM Radio, rules on the books simply ignored. Especially the one rule that is designed to destroy AM, INCIDENTAL RADIATION, no enforcement resulting in doubling the noise floor in about a twenty five year period. When we, AM Broadcasters, complained, we were simply told to go buy a FM station! Hallelujah! Throw your AM investment away. I don't think so!

How do we fix it? Listen to this. Revitalize AM by moving everyone to FM. You have got to be kidding. That does zero to revitalize AM. It simply expands the overcrowded FM band. Understand, however, IT'S ALL ABOUT MONEY! The more players, the more fees. The \$64,000 question, can it be fixed and at what cost? In the spirit of the docket, I will tell you how.

1. Man Made Noise: To late to go back. However, going forward make sure every new RF emitting device meets stringent requirements. Yep, even LED light bulbs.

2. Mandate by rule making, that here forward, every AM radio, in order to be type accepted, must have a full time noise blanker installed. As a former member of one of the best radio manufacturers in America, I put my pencil to it. Cost per radio for the chip installed, \$9.50.

In order to address the new noise floor unfortunately interference standards will have to be cut in half. Example! Where a station used to have to protect a co channel or adjacent channel station to a certain level it must now be reduced such as .5 mv level must be moved to 1 mv ect! across the entire AM spectrum. Some will say this is total chaos, and in someways yes, but we AM Broadcasters didn't screw it up, the FCC did, and after all the AM band is about local and regional service which effects of the change will only be positive as it will allow many stations to increase power and whip the noise floor.

One must remember there are over two billion AM radios out there, and to do anything different, will decimate the stations audiences. Some will say IBOC is the answer. Oh yea, what is there, maybe 100,000 radios nationwide! Hows that work? Also, IBOC is part of the problem with its Hash Generation day and night.

The allowing of FM translators on the AM band was not the worst idea as it did help AM Broadcasters sell coverage they did not have before. It should, however, only come on when the station using it reduces to night power or has a pattern changing issue that needs fill in. It should not be on all the time as it only chases listeners to the FM band.

3. Main Studio Rule: It is something that has outlived its usefulness. I am amazed that that rule, which also applies to TV, allowed two major TV groups to close and abandon their studios in Alexandria, MN. How come? Follow the money! Any Broadcaster that has a facility in a community and chooses to relocate elsewhere, good luck with the revenue stream. I'll guarantee you someone else will jump on it and your rapport with that town will disappear. If you want to maintain sales you have

to maintain presence, but to be mandated at this time in our industry, I say no. It is time for it to go.

4. Another thought that I think makes common sense is AM translators. Every time I see a AM station go off the air. It frankly breaks my heart. Most times it is because the running and staffing of the studio can no longer be sustained. If the station can be run and programmed from another location, WHY NOT? Don't let a community loose it's identification and its station. Local coverage is so important even if it occurs from another location. It's alright for TV and FM. Why not for AM? Once again the rapport with the small station and community is a matter of good business and should not be a matter or regulation.

5. Finally! Please tell me I'm wrong. Many tell me the FCC will do anything in it's power to destroy AM Broadcast. They may be right as I see the FM translator move as a wrong process. My time on this planet is limited but as long as I can drag myself to work at my AM station each day, I will do so. I have not spent 60 years in this business to see it destroyed.

In conclusion, I have a proposed rule making for AM translators. In order to level the playing field, I see no reason why FM stations can have FM translators and AM stations cannot.

1. Any AM station regardless of its class can apply to have a AM translator with power not to exceed 1000 watts and power not to be less than 100 watts.

2. The applying station can send its programming to the translator by which ever means it chooses.

3. The programming must be the same as on the main station and cannot be originated at the translator site with the exception of a community or area emergency. If the providing station wishes to endear itself to the translator area common sense tells one to create programming on the main channel that has some relevancy.

4. Station proposing translator may apply for vacant frequencies as long as that application does not create any interference to existing full time stations or existing AM translator that is licensed. The .5 mv/m signal of the translator must be inclusive in the main channel station and not allowed to extend coverage beyond the main channel .5 mm daytime coverage by more than 10% and may operate at its licensed power 24 hours a day. In the event that the main channel station is off the air, the translator must also go off the air. Translators can not be proposed in communities that have currently licensed AM stations as the intent is not to create competition to an existing AM facility but is designed to provide community service in non licensed or previously licensed communities that have had their AM facilities go off the air.

Every translator must also follow the same standards as AM Broadcast standards for antennas. With no exceptions, antennas must follow standard AM Broadcast antenna rules.

Post Note:

The reason for this proposal makes common sense. It will prevent in many cases current stations from going silent and will allow programming to continue from an existing station that is viable, financially. It will provide numerous communities that have lost their station to regain them and have that all important service. It will definitely serve the public interest.