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While I would like to support any proposal which would serve to aid in the 'revitalization' of AM radio, I'm afraid the Commission is, with this proposal, attempting to put a Band-Aid on a bullet wound.

It's a painful fact, but one which the FCC and broadcasters need to come to terms with: AM radio is dying, and there's nothing - nothing - that is going to save it. The solution lies not in changes to AM signal rules - it lies in accepting AM's impending death, and then taking two specific, dynamic steps which would not only address the issue in a fashion that helped the situation but which would also enhance localized broadcasting on two fronts:

First, expand available FM space to include the 76.1 - 87.9 frequencies, splitting them into the former Channel 5 and 6 television allotments (76.1 to 81.9, and 82.1 to 87.9, respectively).

Second, declare a sunset of all AM broadcasting, to take effect no later than January 1, 2025, but allowing current AM broadcast licensees to be granted space in the 82.1 to 87.9 frequencies, at power levels appropriate to facilitate adequate coverage area of their city of license and effective upon the surrender of their AM license.

Third, increase the ability of all radio stations to serve their communities of license better by migrating existing LPFM stations to the 76.1 - 81.9 frequencies during the same period, in the process permitting them to increase their power output levels to 1,000 watts so they can provide greater service.

Fourth, terminate all FM translator licenses as part of the AM sunset process, except in cases where the licensee can clearly demonstrate a specific need (e.g., terrain irregularities).

While these four steps are by no means small nor painless for today's broadcasters, they would result in greatly expanded value - both economic value to commercial broadcasters and community value to non-commercial operators - while acknowledging that AM radio, like analog television before it, is breathing its last.