March 21, 2016

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

In the Matter of: MB Docket No. 13-249
Revitalization of the AM Radio Service

Comments of Alfred S. Kenyon, III, a broadcast engineer with over 50 years of experience. I became a government contractor in 2006 serving FEMA as a Subject Matter Expert on alert and warning systems and joined FEMA IPAWS as a Project Manager and Engineer in 2010. My background in broadcast alerting and warning includes:

- Charter Member and Co-Chair, Kansas City Area Emergency Communications Committee
- Charter Member, Missouri State Emergency Communications Committee
- Supported the National Weather Service's initial development and field testing of NOAA WRSAME system
- Member, Cincinnati Area Tri-state Emergency Communications Committee
- Member, Ohio State Emergency Communications Committee
- Charter Member, and President, Primary Entry Point Advisory Committee
    - Served as an Advisor to the Board of Directors
- Vice Chair and Chairman, FCC EAS National Advisory Committee
- Served on the FCC Media Security and Reliability Advisory Committee and the FCC Commercial Mobile Service Alert Advisory Committee

I am an associate member of the Association of Federal Communications Commission Consulting Engineers.

BACKGROUND

FEMA's Primary Entry Point (PEP) system is a group of radio stations and satellite program service providers which have made voluntarily commitments to serve as the top level of the Emergency Alert System. The original PEP Station concept was based on the results of the *1987 Emergency Broadcast System Task Force Final Report* prepared in August 1987 for Edward J. Minkel, Managing Director, FCC. At the time the top level of the then Emergency Broadcast System (EBS) was the FEMA Emergency Activation Network (EAN network) consisting of wire service teletypes and the network lines of the broadcast and cable networks. The *Report* addressed a "major concern about the present implementation of the EBS… that it may not work at the national level in a trans-attack of post-attack period."

The *Report* analyzed nineteen options for improving trans-event and post-event reliability of the EBS. Among them was the FEMA and FCC "Last Resort Proposal". This option proposed to use 30 broadcast stations based on the locations and coverage areas. All selected stations were

"located outside the projected "2 p.s.i." target areas" to "help assure their survivability. When the stations are on the air during the daytime, their groundwave signals cover much of the country. With nighttime skywave propagation, all portions of the country would be covered." This option became the Primary Entry Point system or PEP system.

Today the broadcast portion of the PEP system consists of 25 Class A AM stations, 36 Class B AM stations, and 12 FM stations which in combination put a listenable signal over more than 90% of the US population during daytime hours and 100% of US population during nighttime hours. FEMA is in the process of equipping PEP stations with EMP protected generators, transmitters and program origination equipment to enable stations to provide service post-event. To date 37 PEP stations have FEMA resiliency packages installed at their transmitter sites.

COMMENT AND RECOMMENDATION

The Commission's proposal to reduce co-channel nighttime skywave protection for Class A AM stations from the current 0.5 mV/m-50 percent skywave contour to the proposed 0.1 mV/m groundwave contour will significantly reduce available nighttime reach of the Class A AM stations in the PEP system. I urge the Commission to consider that the Class A AM PEP stations are a unique resource. Many PEP stations are equipped to survive events ranging from solar flare to a man-made EMP event either of which could damage the power grid or cripple many alternative information sources such as broadband through disruption of first and last mile connectivity.

Increasing the authorized noise and interference level on Class A channels will cause significant service reductions to the Class A AM PEP stations while only offering limited interference free service gains for stations which might benefit from the proposed change to Class A skywave protections. Changing the Rules will not change the physics of nighttime medium wave propagation. The current protection standards acknowledge that the arrival of skywave signals from Class A AM stations is a given. A rule change which decreases Class A AM skywave protections will create the false impression among some that there is a means of precluding the arrival of a Class A station's skywave signal so that it will not impact a distant local broadcaster.

I urge the Commission not to proceed with the proposal to reduce co-channel nighttime skywave protection for Class A AM stations. Such action will cause permanent irreversible damage to a currently unfashionable but nonetheless valuable resource and will limit the effective reach of the PEP system.

Respectfully Submitted,

Alfred S. Kenyon, III