To: Federal Communications Commission Media Bureau

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Subject: Response to Federal Communications Commission Proceeding 13-249

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I am responding to the following section of FCC Proceeding 13-249 ---

(3) the critical hours protection of Class A stations should be eliminated completely. We seek comment on these proposals. Specifically, we seek comment on the populations that would lose service from Class A stations under this proposal and, to the extent ascertainable, whether such populations currently avail themselves of the service that would be lost.

I live in Pittsburgh, and I have been listening to Class A stations from throughout the eastern half of the United States, and a few stations from the western half, for nearly 55 years. I continue to listen to these stations several nights and some early mornings each week.

In particular, I receive a lot of my news from these stations, and particularly all-news radio stations in New York City, Philadelphia, and Chicago. I listen to these stations several evenings a week. And, I have been listening to one of the nation's first all-news radio stations, KYW-AM in Philadelphia (which provides me with Pennsylvania state news, as well as national and international news), for more than 50 years, the entire time this station has broadcast the all-news radio format.

So, I would be specifically impacted by this FCC proposal. Pittsburgh's all-news radio station, KQV-AM (one of the few all-news stations that only transmits using 5,000 watts of power), only broadcasts the all-news format during business hours, drive-times, and Saturday mornings. Hence, it is necessary for me to receive all-news radio stations from out-of-town during nights and early mornings.

The FCC's rational for this proposal is to increase localism, allowing more power and time at night for local stations to better serve local audiences.

However, I have thought about this and have come to the conclusion that this would not be the best way to enhance a local broadcasting service. If you want to enhance local

radio stations, AM radio is not the best way to do that.

The major advantage of AM radio is long-distance broadcasting. If you create more interference for stations which have been successfully providing a good long-distance service for nearly a century, you are degrading the most valuable aspect of AM radio!

Further, as you increase power on many more AM radio stations during the evening and early morning hours, these stations will start interfering with each other, in addition to interfering with Class A stations, due to the fact that sky-wave transmissions are not limited to Class A stations. Indeed, during optimal ionospheric conditions, some lower power stations (particularly at the lower end of the AM dial) can be heard several hundred miles away from their transmitter.

If your goal is more and better local radio stations, it would be far better to increase the size of the FM radio band, which provides the best local service and cannot provide a long-distance service.

The primary reason more people have migrated from AM radio to FM radio, and now also to newer technologies, is because most people want to listen to music. And, it is quite clear that FM radio and newer technologies do a much better job of transmitting high-fidelity music.

Hence, AM radio is now primarily used for all-news, news / talk, sports, and religious formats. As such, it is natural that these formats attract a smaller, niche audience. Increasing power and night-time hours of smaller, local stations is not going to change this.

AM radio now successfully narrow-casts particular formats, which a certain, albeit a smaller, segment of the population wants to listen to. This segment of the population could be hurt by the elimination of protection of Class A stations, if these stations no longer are financially viable when providing the specific format these people wish to listen to. If these stations no longer have the extended reach to receive the larger audience needed to remain commercially viable, they will either reduce their service or change format to a less expensive format. Neither outcome would not be in the public interest.

All-news radio is a major case in-point. All-news radio is a very labor-intensive format, and hence, a very expensive format. For all-news radio stations to be successful, they must have the power to reach-out to a wide geographic area, to attract the greatest number of people possible from the minority of people interested in this particular format. This is why most all-news radio stations are on AM radio, and most of these stations use 50,000 watts of power.

AM radio may have lost audience, however as I mentioned, this is natural because most people want to listen to music and AM radio is not the best technology for transmitting music. However, AM radio has now found a new role to play transmitting news and information.

Just because a smaller percentage of the audience chooses to listen to news and information broadcasts does not mean AM radio is not fulfilling a very important function. Indeed, in our democracy, it is great that there are AM radio stations, many which can be heard over a large part of the nation, that provide a great deal of news and information, and a multitude of opinions, for the people interested in this type of radio broadcast.

AM radio is not broken. It continues to serve an important need in this country. So, “if it is not broke, don't fix it!”

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