

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

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

**REPLY COMMENTS OF MARK D. HUMPHREY**

Mark D. Humphrey here submits reply comments in response to the Commission's First Report and Order, Further Notice of Proposed Rule Making, and Notice of Inquiry, FCC 15-142, released on October 23, 2015.

The "AM Radio Preservation Alliance" fears that elimination of Critical Hours protections would result in "immediate unbearable interference in the AM band... within the close-in, supposedly-protected groundwave contour of Class A AM Stations", leading to "disastrous results for the existing listeners within the protected 0.1 mV/m groundwave contours..." With all due respect, I would say this threat is greatly overstated.

In the instant proceeding, the Commission is not attempting to change the laws of physics by governmental fiat, but simply recognizes that a 0.1 mV/m field strength is no longer sufficient to provide satisfactory service in our present medium-wave noise environment, and realizes that the 0.1 mV/m "fringe" contour of Class A stations probably isn't worthy of continued Critical Hours protection.

One of the case studies submitted by the Alliance, that concerning WBAL, 1090 kHz, Baltimore, MD, claims a loss of 12% of the population within the 0.1 mV/m contour if Critical Hours protections are eliminated. The resulting interference-free area would then be delineated by the 0.355 mV/m contour. As a 30-year resident of southeastern Pennsylvania based near WBAL's predicted 0.5 mV/m contour, I am personally familiar with the poor quality of service WBAL provides to my local region. Regardless of whether the present Critical Hours rules are retained, I doubt that most members of the public would tolerate listening to WBAL at the 0.355 mV/m contour, let alone the 0.1 mV/m contour, so the claimed "population loss" is meaningless from a practical perspective. Background noise from power lines and other electrical devices is so strong that it overcomes these relatively weak signals. The map submitted by the Alliance as Exhibit P-5 is misleading in another respect, as it fails to account for interference already caused in the Lehigh Valley region by first-adjacent station WGPA, Bethlehem, Pa, operating during the day on 1100 kHz, and disregards first-adjacent IBOC interference from WTIC, Hartford, Ct on 1080 kHz.

This afternoon, I made a video recording that illustrates how poorly WBAL is received just beyond the 0.5 mV/m contour in central Chester County, PA on a state-of-the-art automotive receiver. It can be viewed on YouTube at:

<https://youtu.be/Aso6Ain6bOU>

If the Commission finds it necessary to compromise, I suggest the Critical Hours rules be revised to protect the 0.5 mV/m groundwave contours of Class A stations, rather than 0.1 mV/m. This would still allow many co-channel Class B and Class D stations to operate at full power from sunrise to sunset.

Respectfully submitted on April 18, 2016,

Mark D. Humphrey  
PO Box 307  
Exton, PA 19341