

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington D.C. 20554

In the matter of:)
)
National Radio Systems Committee's) DA 05-1661
"In-Band/On-Channel Digital Radio) MM Docket No. 99-325
Broadcasting Standard NRSC-5)

EX PARTE COMMENT

Edgar C. Reihl, P.E.

I hereby file the following brief ex parte comment in the above matter as a member of the American public and as an AM radio listener for more than 50 years. In this proceeding, the Commission requested comments on the National Radio Systems Committee ("NRSC") initial digital audio broadcasting ("DAB") standard entitled "In-Band/On-Channel ("IBOC") Digital Radio Broadcasting Standard NRSC-5" ("NRSC-5"). Although this standard deals with both standard AM and FM broadcast systems, my comments are directed toward the AM band implementation.

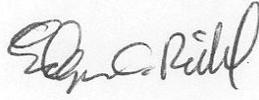
As of this writing, our nation is still coming to grips with the widespread destruction caused by Hurricane Katrina to the City of New Orleans and many other parts of the south. For more than a week, AM radio station WWL, the 50,000 Watt voice of New Orleans on 870 kHz has been continuously broadcasting news and information about the current situation and helping families communicate with one another. For tens of thousands of displaced and homeless people, these broadcasts from WWL received on battery powered radios have been the only source of news and information available to them and to their families. Many citizens of New Orleans have been evacuated to other cities from Texas to Alabama. With its powerful signal, WWL has been able to reach out to these desperate people scattered across hundreds and even thousands of miles to bring hope to them and help them cope with their plight. At night, station WWL is heard clearly as far away as Chicago and beyond. This should certainly serve to underscore the vital role that AM radio plays as a primary communications link in emergencies caused by severe weather or terrorist attacks, as noted by previous commenters in this proceeding. When power and telephone lines are down and cellular towers are knocked off the air, AM radio *gets through*.

If the Commission acts to authorize digital IBOC transmission on the AM band according to the NRSC-5 standard, the effectiveness of AM radio as a communications tool in times of emergency such as the current Hurricane Katrina disaster will be severely compromised or destroyed. The first and second channel interference caused by the digital IBOC sidebands can disrupt reception hundreds or even thousands of miles away at night time. For example, during previous night time IBOC test transmissions from station WOR on 710 kHz in New York, the writer personally observed the complete annihilation of station WGN on 720 kHz in Chicago at a distance of only 120 miles from the latter due to the digital noise sidebands of WOR. Long distance propagation is a reality on the AM band at night, and no standard will be able to change that fact.

Because of its vital role as a primary communications channel in times of national emergency, the Commission *must reject* the NRSC-5 standard as it applies to the AM band and decline to authorize its use for either daytime or nighttime operation. Worthy alternatives have been suggested to the Commission in this proceeding; notably the opening of a new band for digital radio in TV Channel 6.

Finally, the Hurricane Katrina disaster serves to further highlight the previously-filed comments of Mr. Robert Foxworth of Tampa, FL noting the importance of AM radio, in which he stated that "High-power clear frequency AM broadcasting, especially at night, is an in-place, low-tech, widely dispersed mechanism to allow instantaneous multicast messaging... to get information to a vast audience in the event of a disaster". *AM radio remains the best and most dependable source of emergency news and information.* Analog AM broadcasts can be received on simple battery powered receivers that can operate for many hours. Furthermore, the wide area coverage of many AM stations is extremely valuable. *The Commission should not dismantle this vital communications network by allowing the AM band to become polluted with noise caused by IBOC transmissions.*

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Edgar C. Reihl". The signature is written in a cursive style with a large initial "E" and "R".

Edgar C. Reihl, P.E.

September 5, 2005