

AM and FM radio stations are required to operate in the "public interest, convenience and necessity" regardless of band, dial position, wattage or coverage area. Class-D AM radio stations can't serve the public convenience when they receive destructive interference or, when they must reduce power or sign-off completely in the middle afternoon drive.

Its time to level the playing field by migrating all AM radio stations to a new expanded FM band at frequencies between 54 MHz and 87.9 MHz. Currently, only five VHF television channels (2 through 6) occupy 90% of this spectrum space. Under current FCC rules, some TV stations will remain on these low frequencies and others will migrate to high band VHF or UHF frequencies. In my opinion, the FCC should require all TV stations on channels 2 through 6 to migrate away from low band VHF. This will benefit all three services, AM, FM and TV. First, it will eliminate the "impulse noise" associated with operating a digital TV service on low band VHF channel. Second, it will open up enough FM spectrum to accommodate all existing AM stations while providing new spectrum space for thousands of future FM stations. Third, it will forever eliminate the destructive interference and low frequency response that plagues AM radio and fourth, it will remove pressure from the current FM band which is limited to only 20 MHz of crowded spectrum.

Each migrating AM should receive an FM frequency allocation consistent with the rules and mileage separation requirements governing the FM table of allotments. Further adjustments should be made to acknowledge each station's previous AM class and coverage area with a goal of restoring each station to its previous relative status in the community except, all stations will be licensed as non-directional full time facilities at a power level determined by mileage separation.

In the short term, the FCC should allow FM translators to be operated by AM stations under a needs-based formula. The first FM translators should be allocated to Class-D, AM daytime stations that currently broadcast on Mexican and Canadian clear channels and, within that category, priority should be given to those stations receiving destructive interference from across the border.

No auctions for migrating AMs, please. The FCC already awards enough spectrum space to broadcasters with the deepest pockets.

Respectfully,

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