

BEFORE THE
Federal Communications Commission
WASHINGTON, DC 20554

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

COMMENTS OF
Curtis W. Flick

Curtis W. Flick is an accomplished broadcast engineer of many decades experience, who's qualifications are a matter of record with the Commission.

While it is laudable that the FCC has taken an interest in revitalizing AM broadcasting, it should be noted that some of the proposals in the NPRM do anything but, while others are long overdue.

Discussion:

Section A. OPEN FM TRANSLATOR FILING WINDOW EXCLUSIVELY FOR AM LICENSEES AND PERMITTEES

The Commission concludes that the existing program has been a success due to participation. I submit that while allowing any AM licensee an FM translator may be a success in subsidizing bad business decisions by certain small business owners, it is directly harmful to any effort to the stated purpose of revitalizing AM radio broadcasting, and also harmful to the FM broadcast band.

Allowing AM licensees to operate on FM translators adds defacto FM stations to an already crowded FM band, subverts the Commission's auction process for new FM stations, and encourages both AM licensees as well as listeners to abandon the AM band, removing any incentive for both to operate or listen to AM radio. This is hardly revitalization, but is more akin to poisoning the well. The Commission recognizes that competition to AM broadcasters from FM broadcasters is real, yet this section proposes doing more of the same.

Moving AM stations into the FM band already has a track record of certain licensees neglecting their AM facility maintenance in favor of their FM outlet. Some AM stations have been off the air for extended periods, sometimes weeks, while blissfully providing FM programming to their translator in blatant defiance of FCC rules, and the conditions under which these licensees chose to accept both for their translator, and their AM station license. A further encouragement of such bad practice seems on the surface a bad idea, if the intent is to revitalize AM broadcasting, and not to merely provide a means for AM licensees to become FM licensees at the expense of every other FM licensee, and the over crowding of the FM band itself.

Whether these translators are permanently locked to an AM license is irrelevant. There is no good way to do a bad thing.

A potentially viable alternative would be to allow and encourage AM licensees to build and simulcast on-channel synchronous AM booster stations within their already established contours, and within their already established and accepted hours of operation. While this may not have been technically feasible years ago, it is today. This would allow AM stations better coverage within their currently chosen/licensed coverage areas at no expense or pollution of the FM band, minimal if any harmful impact to existing AM stations. In combination with Section F, these boosters could be many, and quite low powered, providing much greater signal in close proximity while at the same time creating almost no additional interference to anyone, or anything. Use of such low powered boosters could justify extended hours for both daytime only and stations with restrictive nighttime patterns and power reductions.

Such an undertaking would not be simple, but need not be costly. This would be a licensee's business decision. The technical details of such an approach would probably be better dealt with in its own separate NOI.

Section A Conclusion:

Allowing AM stations FM translators, especially an exclusive filing window, facilitates an AM exit strategy and encourages the demise of AM broadcasting, not revitalization. Worse, an exclusive filing window for existing AM licensees and permittees actively discourages any other consideration which may actually revitalize AM broadcasting, and promotes additional abandonment of the AM band.

Therefore, this provision of the NPRM should be deleted with prejudice.

Section B. MODIFY DAYTIME COMMUNITY COVERAGE STANDARDS FOR EXISTING AM STATIONS

Section C. MODIFY NIGHTTIME COMMUNITY COVERAGE STANDARDS FOR EXISTING AM STATIONS

This commenter has no opinion other than to suggest that on-channel synchronous booster stations would negate any reason for these sections to be considered in any regard. Synchronous boosters would, as a means to cover the community, in many cases be superior to existing or proposed alternatives, including Section A. (FM outlets)

Section D. ELIMINATE THE AM "RATCHET RULE"

The AM ratchet rule is one of those well intentioned but disastrous ideas that should never have been implemented in the first place.

On the surface, it would appear to reduce interference to other stations, but in practice the interference by incidental and unintentional radiators, notably power lines and devices that fail to meet other existing radiation limits, dwarfs any improvement that might be achieved from the ratchet rule. In fact the ratchet rule makes harmful interference from unintentional radiators more damaging than they would have been otherwise.

The ratchet rule should be eliminated as soon as possible, and those stations already penalized by it given a chance to correct the reduced coverage so imposed. Additionally, enforcement of unintentional radiation limits, almost none at all for several years now, should be vigorously pursued.

Section E. PERMIT WIDER IMPLEMENTATION OF MODULATION DEPENDENT CARRIER LEVEL CONTROL TECHNOLOGIES

This is basically a business decision by licensees. The Commission should not stand as an impediment to the most efficient use of facilities as determined by the licensee.

MDCL technology is not new and has been well proven in the field. The Commission should allow discretion in use of MDCL technology so long as it does not cause harmful interference to other stations exclusively. Although I have my opinions as to which is better, that decision should be left to the licensee.

Section F. MODIFY AM ANTENNA EFFICIENCY STANDARDS

In this section I believe the Commission does not go far enough.

There may have been good technical reason for minimum efficiency standards at some point in history, but that time has long past. Recent local ordinances restricting tower site locations, or even the rebuilding of existing or damaged facilities, are aggravated greatly by the minimum efficiency rules. This commenter sees no reason whatever for any minimum efficiency rule. I would submit that all requirements for minimum efficiency be deleted.

Should a licensee choose to use a 4 foot pole, with a 4 foot radial ground system, requiring him to produce 100KW to meet a 1KW coverage area, of what concern is that to the Commission, the general public, or other licensees ? The licensee himself can choose to accept the increased costs and other challenges associated with low efficiency antennae of any type.

Daytime skywave is not a great concern, so allowing low efficiency radiators would allow greatly increased options

in daytime facility location. The Commission recognizes this problem in several sections of this NPRM.

Nighttime skywave is a concern, so I would propose that the Commission allow any radiator the licensee chooses, provided it both meets horizontal coverage requirements directional or otherwise, and can be shown through either modeling or measurement to not produce skywave radiation 35 degrees or more above the horizon to any greater level than would be produced by a full size $\frac{1}{4}$ wave radiator at the station nominal power level.

In other words, a station licensed at one kilowatt nighttime be permitted any power into any radiator that does not exceed the radiation that would be produced by one kilowatt into a full sized $\frac{1}{4}$ wave radiator with a full ground system in the horizontal plane, nor any angle greater than 35 degrees above the horizon.

35 degrees is an arbitrary number, but I think a good one. The Commission can pick any suitable number, and may wish to open an NOI to garner further technical study, as well as make use of the Commission's capable engineering staff. The Commission should not mandate methodology, but only the radiation limits to be met.

Additionally or in lieu, the Commission should at minimum grant experimental waivers to any licensee proposing facilities that do not meet current efficiency rules. This would permit a gathering of real world data over time as to the efficacy of such a proposal. This imposes no additional regulatory burden on the Commission or staff, as any burden would be born by the licensee who chooses to accept the challenges and associated costs.

Respectfully submitted,
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December 30, 2013