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I attained a First Class Commercial Radiotelephone Operator's license in the mid 1970s, and retain a perpetual General Class license today. I was a disc jockey and transmitter operator for AM and FM stations beginning in the early 1970s and continuing through 1986. I listened to and was involved with AM radio in its heyday of dominance, and I have watched, with sadness, the service's long, slow decline. I offer the following comments in response to the Commission's recent proposal to revitalize the AM band:

In my opinion, revitalizing the AM band will not happen by allowing AM broadcasters to simulcast on or move to other bands. It will not happen by protecting the coverage areas of entrenched corporate multiple-owners and networking regimes. It will only happen if physical interference to the AM band is reduced, AM receivers remain ubiquitous, and, most crucially, if more aspiring broadcasters have legal access to the AM band. The audience needs to know that compelling content is clearly and easily audible in this band! I recommend a Low Power AM service to go along with the Low Power FM service. As far as I can see, thousands of new local voices on AM will do more to revitalize the band than the implementation of any of the points recommended in your proposal. If new technology can be used to make it possible for local, low power AM stations to be run on a "shoestring budget," if regulations on low power AM stations can be relaxed so that compliance and proving it is not a burden, and especially if those stations can pursue commercial sponsorship and underwriting, they can remain economically viable indefinitely, which is what this band needs: a large collection of independent, local stations that do not need to consolidate with big networks or sell out to corporate group owners. One thing that the FCC can do to help promote such a scenario is to canvas America to determine the AM "noise floor" in various areas, in order to identify the largest non-broadcaster contributors to the local noise level, and work with them to reduce noise to the point where AM can be enjoyed again with ordinary consumer-level receiving equipment. Only broadcasters with a compelling (and, in the case of existing broadcasters, a successfully served) mission of knitting together community and providing public safety co-ordination within a large region should have enormous territories, in which the FCC protects them from interference from other broadcasters. In the other cases, the FCC's bias should be to empower the local, independent "little guy," but in all cases to do whatever is possible to minimize interference from non-broadcast sources.

Thanks for considering my views in this matter. Even if the Commission can't address my recommendations on this occasion, I hope they will be kept on file and referred to in future attempts to benefit the AM band. Please pay close attention to see whether any current proposals, if implemented, actually achieve the intended revitalization goal. To the extent that they do not, I would ask that you please give my approach a try.