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KK Broadcast Engineering

In The Matter of MB Docket No. 13-249

I am a SBE certified CSRE/AMD contract engineer based in Lawrenceburg TN. My company provides full and part time service for 21 small market AM broadcast stations in Tennessee, Alabama, Mississippi and North Carolina. Additionally, we do construction work for AM broadcast stations nationwide. We have no ownership interest in any broadcast station. I intend to present comments based on engineering and general business observations collected over 30+ years in the broadcast industry.

As other comments have noted, AM Radio IS important in local markets and in many markets is a vital singular local service. In emergency situations, the AM band is technically easier to receive and should be maintained in all areas as a vital emergency service.

We have attempted to format our comments to follow the paragraphs of the NPRM.

III. DISCUSSION.

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

14. We concur with the Commissions position on this issue with the following exceptions.
 - a. We might point out, in the case of many AM stations, that multiple translators may be necessary to properly fill even a 1kw directional AM pattern without (in some direction) exceeding the coverage limitations set forth in [b.] below. OR that in the absence of an FM channel capable of sufficient power, that additional low power translator channels may be available and necessary to properly fill the AM stations daytime signal contour. To this end we suggest:

previous. If my spectrum analyzer is receiving and plotting the RFI, it must be assumed that local listeners are receiving and tuning away from the same interference.

Sources of RFI include but are not limited to (generally in descending order) and will vary from one environment to the next:

- a. telephone / cable TV lines,
 - broadband noise from telephone and TV cable seems to be the primary noise floor encroachment.
- b. power lines,
 - bad insulators and other arc noise as well as probable control data traveling via bpl data damage AM reception for a significant area around line corridors.
- c. LED traffic signals,
 - rhythmic RFI (often extending into VHF freq) changing with light patterns emitted by many LED traffic light systems.
- d. CFL's,
 - RFI from 250khz to 30mhz has been observed from various CFL lamps.
- e. computer/network leakage,
 - all computers emit RFI. Some are much worse than others.
- f. Televisions and other microprocessor controlled entertainment equipment.
- g. other LED lighting,
 - possibly related to switching power supplies but definitely related to new installations of LED lighting technology.
- h. switching power supplies,
 - the possible cause of several other mentioned RFI sources.
- i. electronic florescent light ballasts,
 - more 250khz to 30mhz RFI
- j. local AM transmitter splatter (previously #2 interference source behind power line).
- k. vehicular noise,
 - common spark, alternator and other impulse noise

l. other local electronic / communications sources,

ii. AM Receiver Quality

- a. AM reception seems to be added to consumer equipment as an after thought.
- b. I personally owned a new FM/AM receiver that emitted so much RFI in the MW region that not only was it's internal AM receiver unusable but it rendered other receivers in the rack unusable as well.
- c. Sound quality on most consumer grade AM receivers is very poor due to poor design and cheap execution. Audio bandwidth is intentionally restricted to cover poor IF and RF design.

iii. Onerous Federal, State and Local Building and Environmental Rules and

Regulations make AM site construction or improvements prohibitively expensive

- a. It seems that every governmental acronym has it's finger in broadcast construction.
- b. Satisfying the myriad of federal, state and local construction regulations is often MORE expensive than the actual construction of the site.
- c. If the building and environmental restrictions continue to escalate at the current pace, it will soon be impossible to build anything, anywhere.

b. Special Considerations for FM Translator Applications

- i. Special consideration should be given to certain situations (and combinations thereof). Pluses and minuses indicate our suggested level of special considerations).
 - a. + + + + Stand alone stations.
 - b. + + + Daytimer and Critical Hours ONLY stations
 - c. + + Stations with impractical night authorizations (2.5kw Day / 6w night)
 - d. + + DAN stations
 - e. + + AM Stations with proven service to their local communities. (probably hard to objectively judge).
 - f. + Smaller market (in an effort to keep large markets from sucking up all available frequencies)
 - g. - Larger market

- h. - Full time local channels
- i. - - - Full time high power channels
- j. - - - - Multi-Ownership (considering AM/FM total ownership)
- k. - - - - Stations with an existing translator.

c. We see no down side to any “class” of ownership for having opened the proposed window.

18. We concur that the cross-service translator has been a success and has served the public interest. We also recognize that the same translators have provided financial benefit to struggling AM stations.

a. We believe that, during the proposed window, it may be advantageous to allow “single hop” waivers for moves of otherwise prohibited distances where there are no suitable channels available for a new CP.

B. MODIFY DAYTIME COMMUNITY COVERAGE STANDARDS FOR EXISTING AM STATIONS

19. Although we are unfamiliar with MMTC's petition, we have ourselves ran into numerous situations where waivers were necessary. Although the Commission was very obliging in its processing of these waivers, the additional engineering expense to the licensee can be considerable. Not to mention the additional work for Commission Staff.

a. A specific case that I recall was an AM being displaced by an “eminent domain” public works project.

- The stations old non-directional transmitter site was on the bank of the Tennessee River.
- The river was the southern boundary between the city-of-license and a neighboring city.
- Since the river was the southern boundary, the city had grown northward AWAY from the river and the existing transmitter site. Due to the river and

tributary structure, the population growth is in an elongated figure 8 shape.

- A new location for the station was found that was closer to the city than the old site.
- It was shown that the new transmitter location covered significantly MORE of the COL population than was currently being covered by the old site.
- Due to the elongated shape of the expanded COL boundaries, it was questionable whether a non-directional site existed that would serve the required percentages of the COL population.
- Even though the population coverage was being improved, due to the coverage requirements, waivers and associated delays were required.
- Thankfully, the licensee was able to pass the costs of licensing the new site back to the local entity.
- This station later became an early user of a cross-service translator to augment their nighttime coverage.

20. We concur with MMTC. It certainly is becoming harder and more expensive to find a site that will provide full required coverage both day and night. Onerous environmental and general construction rules further complicated the site selection process.

Federal, State and local regulations automatically assume that every site will create great negative impact on the environment and society in general.

In reality, very few sites are found to make an environmental (or other) impact. However, it is up to the applicant to spend huge sums of money to disprove the radical fears of a few vocal opponents.

21. We believe that the community coverage requirements for both Day and (especially) Night AM service should be largely relaxed or eliminated altogether. If there exists a situation where FM or TV outlets are limited to the point that the local AM station is the only outlet, then it probably would not be a situation where the AM station would be hindered by land availability nor have a more profitable, nearby market to move toward.

22. Please see #21 above.

23. .
24. Please see #21 above.
25. Please see #21 above.
26. Please see #21 above.
27. Please see #21 above.
28. We strongly recommend that the “Ratchet Rule” be fully deleted immediately.
 - a. As anecdotal evidence...
 1. A local owner has 2 AM stations that are located 1.6km apart.
 2. Both sites are leased.
 3. One has a good site and tower.
 4. The other has a site with many problems, including a deteriorating tower, old ground system, marshy site, areal flooding, problematic access, etc.
 5. Technically, either frequency will work at the others location with full spacing to all incumbents. Due to the ratchet rule, the station with the failing infrastructure can not co-locate with the other co-owned site without reducing power dramatically.
 6. Being able to co-locate will almost certainly improve the signal of the failing site, reduce expenses and maintenance costs for both.
29. Please see #28 above.
30. Please see #28 above.
31. Please see #28 above.

32. We concur that MDCL in all it's various forms should be permitted by notification only.
33. Please see #32 above.
34. Please see #32 above.
35. Please see #32 above.
36. Please see #32 above.
37. Please see #32 above.
38. Please see #32 above.

39. Similar to MMTTC, we believe that the Commission's rules relating to system efficiency should be relaxed in the interest of site selection and tower limitations. However, ONLY if a site supportive of a full efficiency system can not be built. We are not certain of the merit of allowing stations to increase power to makeup for sub-par efficiencies. We would

propose that reduced efficiency systems be allowed ONLY by showing and wavier after all other remedies have failed. ADDITIONALLY, it should be allowed that other applicants may, by field strength measurements, contest contour protections and prove that the reduced efficiency system does not pose prohibited overlap in their application proceedings. Thusly, the protected contours of the sub-standard station would be reduced to match it's reduced coverage.

We commend and thank this Commission for finally taking a proactive look at the challenges that AM Broadcasters face in the real world.

Sincerely,

A handwritten signature in black ink that reads "Kevin C. Kidd". The signature is written in a cursive style with a large, sweeping initial 'K'.

Kevin C. Kidd, CSRE/AMD