

RE: FCC 13-249 – Commentary in response to the FCC’s Notice of Proposed Ruling Making in the Matter of the Revitalization of the AM Radio Service

In my view, ‘digital’ is the way to revitalize the AM Radio Service; however my sense is that the only commercially-viable reason to embrace digital radio is the potential that it may be utilized to multi-cast several programs attached to a single carrier, utilizing the existing commercial AM and FM bands.

Multi-Casting In-Band and On-Channel (MC-IBOC) contributes to a modern and efficient use of the radio spectrum, while enhancing programming options for listeners and giving a financial incentive to broadcasters.

Ibiquity’s AM version of “HD-Radio” does not provide for multi-casting.

Present digital radio methods, including “DAB-Eureka 147”, “DRM-Digital Radio Mondiale” and “Ibiquity-HD-Radio” are based on modulation techniques originally conceived in the 1950’s and 1960’s that are not spectrally efficient when compared to more recently devised methods. Even though Ibiquity’s FM version of “HD-Radio” provides for some measure of multi-casting, innovation will likely render it, along with the other digital modulation technologies, obsolete within a decade or so.

I should point out that my opinion on this subject matter is somewhat biased because I am the inventor of the only digital radio technology that provides for multi-casting on both the AM and FM commercial bands.

My digital radio invention is in the pre-patent stages so I will not particularize how the technology works at this time. I can attest that it provides exponentially greater data thru-put, making it theoretically possible for an AM broadcaster to multi-cast as many as 10 programs on a single +/- 10 kHz channel and for a FM broadcaster to multi-cast as many as 100 programs on a single +/- 100 kHz channel OR approximately half as many programs while maintaining the conventional analog portion of the signal.

Based on the aforementioned, any proposed rule making which is designed to revitalize or otherwise improve the AM Radio Service, should not preclude digital-multi-casting on AM.

Peter Blake – January 22, 2014

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(see also CRTC Call for Comments 2013-572)