

BEFORE THE
Federal Communications Commission
WASHINGTON, DC 20554

In the Matter of

Revitalization of the AM Radio Service

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MB Docket No. 13-249

To: The Commission

Comments of
Bryan Broadcasting Corporation

Bryan Broadcasting Corporation (BBC) is licensee of four AM stations and four FM stations/permits in Texas. As broadcasters of long standing, BBC has watched the decline of audience share for AM stations for decades. It is our belief that the AM band has become overwhelmed by interference and impulse noise to the point it presents an audio product unacceptable to modern listeners. As owners of multiple AM stations, BBC has great interest in the outcome of this proceeding.

1. Introduction

The noise generated by unlicensed devices on the AM band has been noticeably increasing for years. The simple attempt to listen to AM radio in a fully lighted and connected home at night will demonstrate that a crystal clear signal is seldom found. It is our belief that if a consumer today were presented with that sound quality in a new portable device, they would return it to the store as defective. BBC has searched to quantify this rise in noise floor over the years, but it appears studies spanning several years at specific locations have not been undertaken. But, in reality, one only has to listen inside a home where smart phone chargers and computer monitors are operating to understand the magnitude of the problem.

Unless manufacturers begin making CFL bulbs and power supplies that have no spurious emissions and consumers are convinced to gather up all their Part 15 devices and return them, there is no going back to a quiet, low noise floor AM band. While this is a facetious scenario, the AM band non-broadcast noises will never go away; AM must relocate and find a new, quieter home.

2. Translator Filing Window for AM Licensees

BBC enthusiastically supports the idea of an FM translator filing window for AM licensees on a one per station basis. The FM band is not susceptible to the impulse noises that make AM unacceptable to modern listeners. BBC also supports the idea of permanently linking a translator assigned during this filing window to a particular AM station.

In reference to this window, BBC would make the following comments:

a) Small market daytime AM stations are the most likely to be at risk from the rising expectations of the modern radio listener. As the licensee of a daytime station, BBC knows from first hand experience the difficulty in serving a community without a signal during morning drive time or the evening when many community events are scheduled. The experience in Canada is illustrative; the last daytime station there signed off in February 2013. BBC would ask the Commission to consider opening the filing window to Class D AM stations first. This would allow daytime only stations (or those with less than 25 watts of power) to have first access to available FM spectrum

b) Since these FM translators assigned during this special window will be permanently assigned to a particular AM station, it would serve the public interest to have stability in service equal to that of the parent AM station. Therefore BBC would ask the Commission to give primary status to the translators assigned during this window.

c) BBC agrees with other proponents of AM revitalization that this window should provide an opportunity for an existing FM translator to have a major change in location and channel in order to provide an opportunity for an AM station to relocate a translator from an area with less need. Any translator which requires a major change to its facilities would also be permanently linked to the parent AM station.

3. Suggestions for Future Notices of Inquiry

BBC believes there should be a review of skywave protection contours for Class A AM stations. While the CDBS does not specifically denote AM daytime stations, an informal search for AM stations with <25 watts of pre-sunrise power returned a value of over 800 stations. Similarly, in the continental United States an informal count of skywave protected Class A stations returned a value of 58. We believe it would be in the public interest to increase the opportunity for local community service by allowing Class D stations to operate at pre-sunrise power during times when skywave protection would otherwise be in force. As there are many other ways to listen to distant signals, BBC believes local communities would benefit from service from a local radio station.

BBC believes the testing underway by the National Association of Broadcasters and others will demonstrate the viability of digital-only operation by AM stations on the AM band. Should this prove out, BBC would ask the Commission to address the issue of receiver standards. Much as the digital TV conversion was preceded by a digital receiver requirement, the Commission should require AM digital-only mode to be the default AM mode in receivers and tuners before any sunset of AM analog broadcasting. This “digital sunrise” would serve as the long-term and final answer to the technical problems that plague AM broadcasting today.

4. Conclusion

Bryan Broadcasting Corporation, as the licensee of class B, C, and D AM stations understands the technical problems of operating in the environment of the AM band. We believe that all the proposals in this rulemaking will benefit AM broadcasters and the people of their communities. The laws of physics and lack of attention to interference standards have put AM broadcasters in a predicament not of their making. These proposals are an excellent first step in finding a solution that serves the public while preserving the ability of AM broadcasters to reach listeners who expect high quality from their audio services.

Respectfully submitted

A handwritten signature in black ink, appearing to read 'Ben Downs', with a long horizontal flourish extending to the right.

Ben Downs

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