

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

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MB Docket No. 13-249

WorldWide Antenna Systems (“WWAS”) has designed and is in the process of testing a High-Efficiency Broadband Antenna (the “HEBA”) to specifically address AM antenna issues of height, space used and broadband radiation efficiency. The antenna’s new technology does not require a ground system, in most cases uses less than 3,600 square feet of space and is less than eighty feet in height. This means that the total installed cost of the HEBA is substantially less on average than a comparable monopole with tower and ground system before site acquisition costs.

As a result of recent testing and field strength measurements by our engineering staff as well as analysis of the results by a consulting engineer at power inputs ranging from 100 watts to 1,000 watts, using the direct method of power determination that is described in Section 73.51 of the Federal Communications Commission’s Rules, the results demonstrate that the HEBA exceeds the FCC’s minimum field strength requirements.

Nevertheless, WWAS urges the Commission to reduce the minimum field strength values set forth in Sections 73.182(m) and 73.189(b)(2)(i) – (iii) of the Rules by approximately 25 percent and revise Sections 73.182(m) and 73.189(b)(2), as proposed in Appendix A of the NPRM, so as to permit continued development of alternative AM antenna systems, such as the HEBA, that allow AM stations to use smaller antennas that do not require a ground system.

Encouraging the development of such innovative AM antenna systems would have the following results:

- AM broadcasters would have lower costs and greater flexibility in terms of site selection for new or replacement antennas, which is particularly important for smaller communities that have reduced access to other forms of local media as many smaller-town newspapers have been unable to compete with digital media such as Craigslist.
- We understand, based on our research, that there are a number of groups with specific ethnic or other interests that are having difficulty accessing AM stations in many communities. While some of these communities are served by Multicultural Broadcasting and independent stations, there are others that have not been able to acquire a station due to the land cost of a new tower site. The use of a shorter, small-footprint, antenna, such as the HEBA, would permit the acquisition, and continued operation, of AM stations by the proponents of such ethnic and other specialized programming.

- Then there are stations that have been priced out of their markets completely. Based on preliminary discussions with an AM station in rural Pennsylvania currently on a temporary long-wire antenna, which has done an extensive search for another location after being unable to renew the lease on its former tower site, it probably has no other alternative to a small-footprint AM antenna. Unless the station can use a small-footprint antenna, continued operation may prove impossible.
- We do not believe that lowering the current minimum efficiency standards will have negative consequences for the public as small towns tend to be closely tied into their local AM stations through coverage of high-school sports and other community events. If the quality of their reception declines, they don't hesitate to pick up the phone and call their local station.

Although our testing process on the HEBA is not yet complete, preliminary results have demonstrated that the antenna does not produce higher levels of skywave, groundwave, blanketing, heat or any other form of RF interference than a comparable monopole. We do not believe the current rules to assess the performance of systems of electrically-short antennas need to be changed and at this point we do not believe that other rule changes would be needed to permit the use of these antennas.

We look forward to providing any additional information as required.

Sincerely,



Kurt Gorman
Chief Engineer/Technical Consultant
WorldWide Antenna Systems