

LLOYD BANKSON ROACH

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Regarding FCC Docket 13-249 AM Improvement

For over 48 years, I have been directly involved with AM Medium wave broadcasting in the United States. Beginning with WFIL-AM in Philadelphia, I have programmed, built, managed and owned over 25 AM radio stations. Most recently I was the licensee and sole owner of WPWA-1590-AM, Chester, PA and WCOJ-1420-AM, Coatesville, PA. I also had a substantial interest in WNAK-730-AM, Nanticoke, PA, WCDL-1440-AM, Carbondale, PA, WHYL-960-AM, WAZL-1490-AM, Hazleton, PA, Carlisle, PA, WENY-1230-AM, Elmira, NY, WENI-1450-AM, Corning, NY and WCLI-1350-AM, Corning, NY.

In 2000, I built a new radio group, Radio 81 Radio for the express purpose of exploiting the advantages of AM radio. I have held commercial radio telephone licenses, and presently hold an Amateur Extra Radio License, K3QNT and certifications from the Society of Broadcast Engineers, including a Certified Broadcast Technologist (CBT), Certified Broadcast Radio Engineer (CBRE) and AM Directional Specialist certification. (AMD)

As career radio broadcaster and station owner, I would like to limit my remarks to the positive things the FCC could do immediately to improve the AM service.

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#1. Begin assisting applicants with changes. Applicants for Special Temporary Authorities and Constructions permits must deal with the oppressive and sluggish administration at the AM branch. It takes weeks, if not months to get a response from this branch. Because of the AM Freeze, applications literally impossible at the present time. AM radio has clearly taken a back seat at the FCC for decades. If the commissioners are serious about what they assert, such as Chairwoman Clyburn, unlock this system at once.

#2 Get serious about enforcement of man-made noise to the medium-wave band. For decades the FCC has enabled computers and other manufacturers of switching devices to create havoc with AM listening. No manner of changes in day or night patterns, including power increases are going to mitigate the damage done by these interfering devices. Unlike the FCC's stated mantra that on-channel interference must be reduced it's the off-channel noisemakers at every Burger King cash register and office microprocessors which now dominate our world. I suggest that each and every commissioner purchase an expensive BOSE or like quality radio with AM capability, put it on your office desk and see if you can hear the local Class "A" AM station clearly. Chances are high, you will not.

#3 While I applaud the effort to enable small market daytime AM stations to apply for an FM translator, it certainly has made a difference in many of these markets. However, if FM is the answer, then why not close down the AM band and build a new FM band so these broadcasters can operate on a level playing field. The whole idea that an FM translator can mitigate the AM problem is ludicrous.

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#4 While changes like the “Moment Method” which has replaced tedious F/I measurements, this has little to do why the listening public is fleeing AM radio. The FCC has made it so expensive and so difficult to operate an AM station that any businessperson would clearly look for other methods to reach their intended audience. Many stations, including mine, now depend on the Internet to provide clear 24/7 coverage of their markets. This is particularly attractive because there essentially no FCC technical regulation on this platform. AM Radio licensees need to know that the FCC is on their side by making things far easier than they have been in the past.

#5 The FCC has contributed to AM radio’s decline by permitting the major broadcast owners to abrogate their responsibility to the listener and their license by abandoning the EAS responsibilities in many major markets. In Philadelphia for example, all of the 50,000 watt AM stations no longer have leadership responsibility in the EAS system. It appears that even the FCC believes AM is dead by these actions. I have been in senior management of state and local Emergency Management for several decades. AM radio is still the most ubiquitous and trouble-free way to disseminate information to the public. The FCC needs to improve AM radio, if for no other reason than our Civil Defense.

#6 Excellent comments have been filed by the nation’s premier consultants, engineering firms and broadcasters. These technical suggestions are sound. The FCC should take heed before the service crumbles completely.

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I would add the FCC does no service to any AM broadcaster by promotion the monopolistic roll out of the AM IBOC system by the iBiquity company. Never, in the history of American broadcasting has an AM licensee had to pay for the privilege to use a technology that has been approved by the FCC as the exclusive method. Not FM Stereo, not AM Stereo, not ever! I recommend you rescind the IBOC AM system immediately and in doing so eliminate the destructive interference from the first adjacent channel of every station who would like to be heard by its listeners. For example, here in Bedford, Pennsylvania, WGN-720-AM is now unreadable on sky wave because of the IBOC AM interference caused by first adjacent, WOR-710-AM.

If some or all of these suggestions were made practice, it's possible that former and present AM radio station owners would be encouraged to improve our programming and hence improve the service.

Respectfully submitted.

Lloyd Bankson Roach