

In the matter of the FCC's proposal on "AM revitalization": I appreciate the opportunity to comment. I would like to structure my comments based on various concerns that are commonly expressed by AM listeners.

Noise/interference: There is no question that listeners to the AM band face more problems related to noise and other types of interference than they did just a few years ago. This reduces the "effective listening area" of any particular station, plus makes listening more fatiguing. Noise sources can be any number of electronic devices that are commonly found around homes and businesses.

For my own part, I have not found it difficult to overcome noise and interference problems. If a listener is interested in programming content on a particular station, they are typically motivated to take steps as need to improve listenability. However, I believe that some of the proposals presented to allow AM stations to increase effective radiated power when possible have merit. The FCC should also strongly consider tightening standards for RF interference emitted from non-radio electronic devices.

Content: A number of AM listeners are unhappy with the large amount of "national" or "syndicated" content, which reduces the amount of local content. These listeners would rather see more local content on their local AM stations.

I see some merit in that position. However, local content is significantly more expensive to produce. So there is a middle ground somewhere for a station to remain financially viable.

I have the good fortune to be able to enjoy a large amount of both local content and national content on my local stations here in Lexington, Kentucky. The two primary general-interest AM stations here maintain approximately a 50/50 split.

I would hate to see restrictions on the broadcast of national/syndicated content. Those stations that do invest in good-quality local content will probably be the winners in the competitive marketplace. So, those stations who ignore this area are likely to suffer financially.

Public Service: A number of listeners have remarked that many stations seem to not have any real ability to do public service work in the case of a local emergency such as a storm, railroad derailment, etc. One station in a market may do a good job of suspending normal programming for coverage of the event, while another one continues with "12 in-a-row of your favorite oldies".

In my area, there is considerable pooling of resources among radio and television stations. For example, in the case of severe weather, the meteorologists on duty at the time are typically broadcast on all radio stations in a particular ownership cluster.

AM stations should be encouraged to use whatever means are necessary to be sure that there is coverage of important life-threatening events in the community, even if ownership lines are crossed. Creativity and cooperation should be the rule. Local government entities, the National Weather Service, etc. should be required to work with stations as needed to ensure a timely flow of information.

Local ownership vs. Corporate ownership: A large number of AM listeners bemoan the fact that several large corporations own vast numbers of AM stations, leaving very few that are owned by residents of the served community. This is a relatively new phenomenon, as down through the years the FCC has gradually relaxed limits on the number of stations that any one entity can own.

While I don't consider the large corporations such as Cumulus or Clear Channel to be "evil" per se, I don't think this ownership structure is really optimum, all things considered.

The two primary AM stations in my market are both owned by large corporations, yet

have excellent local programming as I have mentioned, and also have excellent coverage of community emergency situations. By using Internet streams, I have listened to stations in distant markets and often found the same thing.

Still, one can certainly make the case that AM stations are better if owned by consortiums of investors in the local communities being served.

Returns on investment will likely continue to decline in AM radio over the next few years. I believe this will cause the large conglomerates to lose interest in AM, choosing instead to invest their money in ventures that have a higher return. This will make more stations available for purchase by individuals and smaller groups. And prices for these stations may be more affordable than in the recent past. If this migration begins to take place, the FCC should do nothing to unnecessarily interfere, and should in fact encourage it. Radio stations could gradually move back to local ownership where public service is of much more importance than maximizing profits. The founder of one large radio-station conglomerate once said his company was really an "ad agency". While stations do need to earn a reasonable financial return, an emphasis on public service is important.

Technology: A number of AM listeners believe that the current, nearly 100-year-old AM analog technology should be completely scrapped in favor of new digital transmission modes that improve signal quality.

I do not agree with this position. While analog AM technology is certainly old, the other side of the coin is that it is quite simple and inexpensive to implement. Simple receivers are quite inexpensive and readily available as they have been for decades. Transmitters are reasonably priced since the technology is simple and well established.

I am also not impressed with the current attempt at digital AM transmission, In Band On Channel (IBOC), which is wasteful of spectrum, and only somewhat improves quality.

The three most important things in radio are content, content, and content. Except for a major improvement such as the introduction of FM, few "quality improvements" (AM stereo, IBOC, etc) have been embraced by the public as worth the extra money for receiving equipment.

I have no objection to the various ideas about allocating the old TV channel 5 and 6 frequencies for a new digital broadcast service. If current AM stations wish to move to that new service, and abandon their existing AM analog allocation, that is OK. But existing AM stations should NOT be required to cease analog transmissions with the facilities they currently operate.

To summarize, technology is always in a state of flux. AM radio has considerable competition for ears that didn't exist just a few years ago. But the AM broadcast radio service could well evolve into a more locally focused, technologically simple system that can be relied upon in emergencies. The FCC should do everything in its power to promote such a transition, so that AM radio continues to contribute to a safe, informed, entertained American populace.

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higher return. This will make more stations available for purchase by individuals and smaller groups. And prices for these stations may be more affordable than in the recent past. If this migration begins to take place, the FCC should do nothing to unnecessarily interfere, and should in fact encourage it.

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Another aspect of the technology that some listeners consider outmoded is that since the AM broadcast band is at such low frequencies, nighttime "skywave" interference is a problem which causes stations to have to reduce power. For my own part, I continue to find very interesting programming on distant stations at night, while my local stations are still quite usable. So the nighttime skywave "problem" is actually a benefit not a problem.

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