

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the matter of)
)
Revitalization of the AM Radio Service) MB Docket No. 13-249

The proposed rulemaking to revitalize the AM radio service largely does not address the reality of the issues facing the AM broadcaster and thus provides no solutions to the real problems of the AM service.

The MW band in which the AM radio service exists is riddled with issues in which most have no cure and others that have no reasonable cure. The commission itself is at fault for not maintaining the myriad of man-made interference issues like, high voltage line re-radiation, failing/failed/dirty high-voltage line insulators, noise generating power transformers, electrical line re-radiation, neon signs, florescent lighting, computers, switching power-supplies/chargers, electrical heaters, light dimmers, electric motors, electric train lines, Etc. Even with the limitations of some devices that fall into Part 15/18 compliance requirements, the number of and close proximity of typical devices found in the common household, as well as the vast number of others found in a typical metropolitan city, all add up to create a significant amount of interfering signal. In addition, other negatively contributing factors are atmospheric conditions like heat and lightening static, skywave propagation factors like night/day and winter/summer, ground conductivity, long wavelengths, complexities with directional arrays and the abilities to maintain them, large plots of land, narrow bandwidths, poor quality receivers with no mandated quality standards, steel structures like bridges/high-rise buildings/elevated trains.

There are the added burdens of cost and availability for large parcels of land, the costs for tall towers, engineering firms, consultants and station engineers that can design, build and maintain complex directional arrays and the diligence to keep these antenna systems well maintained. Zoning issues and other costs like liability insurance, taxes and general antenna maintenance are high on-going operating costs that are traditionally much higher in cost than that of a typical FM station. Many of these cost burdens also have no alternative solutions and owners then face investment decisions in areas of their operation that are really not justifiable for the given return. This has caused some operators to skimp on maintenance items like keeping fencing in good repair, their transmitters and directional antennas in tolerance, EAS, remote control, Etc. None of these issues are at all addressed or solutioned by docket No. 13-249!

The background in docket No. 13-249 cites issues with declining audiences and total listenership attributed to the quality of the signal. The MW band for many years now has not been suitable to provide the quality of transmission sought by the public. Technological improvements over the recent decades has brought a myriad of other more reliable, higher quality playback, storage and distribution systems, than AM broadcast stations could ever compete with or exceed in quality or robustness. The dockets' proposed solution to provide FM translators for AM stations is not at all a solution. The current FM band has enough of its own challenges. There are not enough open FM allocations to facilitate the needs of the entire AM radio population in any one city and thus, should not be at all considered any kind of solution.

In some cases where allocations may be available, they likely do not have the ability to suit the coverage the stations current or predicted MW band coverage and will only create more crowding issues for the existing FM operators.

The proposal to modify the coverage standards for both day and nighttime operations are neither in the spirit of fixing the larger problem that plagues the AM stations coverage. The spirit of these rules is to see that an allocation will justifiably serve its community of license. As its allowed existence will place added restrictions to others on and adjacent to the sought after allocation, the waiving of this rule could allow a station in Town A to be allocated a license that only served 50% of its community which thus may prevent a station in Town B from serving 100% of its community. Adopting this proposal would only go against the spirit in which the current rules were conceived.

The AM ratchet clause is good in spirit, but bad in reality. When implemented, the reduction in the skywave radiation is usually not as adequate as needed for the far field interference. Being that the most used method to lower the skywave radiation is a simple reduction of power, this would also deteriorate the stations local coverage. There are fewer ways a non-directional station has than a directional in modifying its towers to achieve vertical nulls or reductions in skywave power. No matter the choice, the cost to do so is typically significant. As such, it is burdensome and can be cause for a broadcaster to not make any changes at all.

The proposal to modify the antenna efficiencies should not be considered. The lowering of antenna efficiency is usually due to a lack of height. This is also cited in the NPRM as being the typical cause for the need of this type of modification. Short radiators generally increase the skywave contribution and thus create more of a problem than solution.

In conclusion, I find Docket No. 13-249 lacking of any true solution. I urge the Commission to seek the expansion of the existing FM band by extending it down to 76 Mhz. The old analog TV channels 5 and 6 spectrum is the perfect solution for creating new facilities for the AM stations. This would provide them a viable ability to compete with more equality in both technological equality and growth. Radio manufacturers can very simply and cheaply implement modifications to expand their tuning range to encompass the added frequencies. Our current HD standard in the FM band has proven itself to be reliable and thus would provide us the same digital solution throughout. Once a planned transition period has completed for the migration of the stations and building of the new receivers, the MW band would then be used by local municipalities for providing local public information and emergency notification to its citizens. This would be a great benefit to the public in multiple ways, providing them with more quality programming from the broadcaster and new sources of local, non-commercial information from their townships. There's no better time than now with the TV repack calculations that are underway. Reserve 76-108 MHz for the radio broadcasters and really provide a solution to their problems.