

"AM on FM" Translators

2. Holston is a strong proponent of FM translators for AM stations. As noted above, the programming of each of its four AM stations is carried on an FM translator (one translator per AM station). Holston's President was the first Chairman of the NAB's "AM on FM Translator" sub-committee when he served on the NAB Board of Directors, and Holston's first "AM on FM" translators were established through waivers the company obtained of the then-current FCC rules.

3. Holston believes that every AM station should be afforded the opportunity to have its programming carried on one FM translator, and it endorses the concept of an FM translator filing window exclusively for licensees of AM stations.

4. Holston also endorses the concept of giving primary status to translators carrying the programming of an AM station if the licensee of the AM station chooses to voluntarily turn in its AM license. In such cases the FM translator should be allowed to operate with up to a maximum power of 250 watts effective radiated power--interference considerations permitting--regardless of whether or not the 60 dBu contour of the translator extends beyond the 2 mV/m daytime contour of the AM station whose license is being surrendered.

**Setting Aside Certain VHF TV
Channels For Use by Existing AM Stations**

5. Holston endorses the allotment of two low band VHF TV channels for use by current AM licensees. After reviewing the number of TV stations operating on channels 2 and 3 versus the number operating on channels 5 and 6, Holston believes there would be less disruption in the broadcast television service if channels 2 and 3 rather than channels 5 and 6 were chosen for this purpose. Rather than conventional wide-band FM, a digital standard should be designated for this service, and the VHF version of the open Digital Radio Mondiale (DRM) standard is the obvious choice. Since new receivers are going to have to be designed anyway, selecting TV channels 2 and 3 versus channels 5 and 6 (6 being adjacent to the current FM broadcast band) for this service should be no inconvenience.

6. AM broadcasters who voluntarily construct stations on these new VHF radio broadcast channels should not be forced to give up their AM band licenses or alternatively they should not be forced to do so for at least five, but preferably ten, years. Their "AM on FM" translator licenses whether they hold "primary" or "secondary" status should not have to be surrendered at any time in the future.

The Controversial Proposal - Limiting AM Bandwidth

7. Since his youth Holston's president and many of his friends in the engineering community have been proponents of

"high fidelity" AM broadcasting. He even lamented the limitation of the NRSC standard when it was introduced trimming AM fidelity to 10 kHz (kHz). After a great deal of thought over the past few years Holston has changed its view in this regard. An AM channel in the United States is ten kHz wide. AM stations here transmit double side bands; hence, every AM station using the NRSC ten kHz audio filter is occupying twenty kHz of spectrum--its own ten kHz channel plus half of the lower adjacent channel and half of the upper adjacent channel.

8. Receiver manufacturers have attempted to minimize adjacent channel (and other) interference by continually narrowing the audio response of their AM receivers through the decades to the point where almost all AM receivers today--even those in luxury automobiles--pass considerably less than five kHz of audio fidelity. Most scarcely pass three kHz. Stations are transmitting ten kHz of audio fidelity, and almost no AM receivers can reproduce much less than half that much.

9. The Commission should mandate five kHz audio filters for all AM stations. The receivers won't know the difference. They only pass much less than five kHz now. Listeners won't know the difference. Adjacent channel interference, one of the principal factors hindering AM nighttime reception (and to a lesser degree daytime reception), will be virtually eliminated.

10. Eventually manufacturers of AM receivers will be motivated to actually broaden the frequency response of their receivers to four and a half or five kHz--actually improving the quality of AM sound! It's a move that should have been made decades ago, and we admit that until we faced the facts we were dead set against it.

11. Holston posits a final thought on this issue. Before the major broadcast TV networks turned to satellite distribution, only the top TV markets "on the Round Robin" enjoyed AAA quality 30 to 15 kHz audio quality. The other approximately 200 TV markets only enjoyed AA audio quality, and guess what? That was five kHz audio quality, and the Beatles still sounded pretty good on the Ed Sullivan Show. After all TV audio was FM.

Respectfully submitted,

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