

Before the
FEDERAL COMMUNICATIONS COMMISSION

Washington, DC 20554

In the Matter of)
) **MB Docket 13-249**
)
Revitalization of the AM Radio Service)
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COMMENTS BY THE AMERICAN ASSOCIATION OF INFORMATION RADIO OPERATORS

The American Association of Information Radio Operators (AAIRO.org) represents the interests of more than 350 licensees of Travelers Information Stations, both at the local and federal government levels, as well as those who maintain an interest in the TIS service.

These comments are a response to the FCC’s present Notice of Inquiry in which the Commission seeks comment on the threshold question of whether “opening the Expanded Band (1610-1700 kHz) to further development would be beneficial to the revitalization of the AM Radio Service.” It is our opinion that the answer to this question lies in the goal(s) of such a “revitalization” effort.

If a goal is the reduction of interference to radio stations in the legacy band (540-1600 kHz) by virtue of certain stations ceasing to operate on their present frequencies to migrate to the expanded band, then despite the fact that the existing expanded band broadcasters will thereby incur more interference than they currently have, perhaps one could consider this a marginal revitalization. Presumably the migrating stations would achieve greater coverage or other benefits as a result of the move. Perhaps they would even be able to convince their audiences to move with them.

If a goal is to make room for new locally-programmed radio stations on the expanded band to encourage diversity in ownership and/or localism in programming, perhaps there would be some marginal value there as well. Of course, that is what AM looked like prior to deregulation in the 60’s and 70’s; and that did not prevent massive listenership losses to fledgling FM band stations. And, the new stations would also have to produce a profit for the station owners, which is not something one-off AM stations are doing these days.

But if the ultimate goal of a continued migration of broadcasters to the expanded band is that radio listeners will be “re-attracted” to the AM band in general, we believe that the effort will be an expensive failure. The AM band has been bleeding listeners for decades due to a list of major technical and well established market-based factors. But most of these factors are not related to the crowded condition of the legacy band that a migration would seek to solve. As mentioned, music listeners abandoned the band decades ago for high quality FM stereo. They will not be coming back. Now, drowning in digital din from a thousand directions, the monaural AM service struggles to keep its head above water, while its syndicated news-talk content is routinely duplicated on FM and the on the internet.

While admirable, the goal of making AM listening somewhat less unpalatable is not the same as making it more attractive. The latter is what will be required for any revitalization to begin.

But attracting listeners back to the band will not be accomplished with technical tweaks. Experience has shown us that even a major upgrade - such as one that makes AM sound like FM - won't help if the result can't be received on existing (analog) radios.

As many a commenter has lamented in trade periodicals, only if AM has unique and attractive content will listeners consider a return. Had not talk radio made AM its almost exclusive province in the 1990's, AM listening levels would today be even lower than they are. It is obvious that the band has little function in today's age, unless it offers something exclusive.

Though it is certain that the FCC did not intend this result, the containment of the Travelers Information Service to the AM band serves to illustrate the point. Motorists routinely are presented with road signs along our nation's highways, in cities, and approaching airports and national parks, advising them to tune to AM frequencies for special information. Sometimes the information relates to an emergency, to an infrastructure failure or to an impending disaster that is relevant at their location or in their situation. Again and again, the TIS service has proven that when listeners perceive that important and pertinent information is presented to them only on an AM frequency, they will tune to an AM frequency.

The American Association of Information Radio Operators, today, represents hundreds of TIS licensees who, though secondary to primary broadcasters, serve their agencies and communities by providing motorists information on a daily basis and standing ready to provide emergency information relating to wildfires, hurricanes, power outages and all manner of danger as it affects their local areas.

After Hurricane Sandy, it was clarified in FCC Report and Order 13-98 that TIS stations indeed can and should keep listeners apprised of hazards that affect life and property. The document makes clear that NOAA Weather warnings, AMBER alerts and other timely

information is appropriate for TIS broadcasts when it is pertinent. The Commission, more recently, has allowed the Service's audio bandwidth to be upgraded to enhance intelligibility so emergency messages may be better understood (FCC Report and Order 15-37).

Because the majority of TIS stations are licensed on AM frequencies 1610 and higher, the TIS service would be disproportionately affected by the inclusion of more broadcast stations on the expanded band. Therefore, it is critical that any plan the FCC may consider to populate this band with additional broadcasters will accommodate what has become a critical service. TIS licensees are found in every branch of our Military, Customs and Border Protection (CBP) along the entire US/Mexican border, numerous locations by Departments of Transportation along highways, dozens of locations operated by the Department of the Interior and in hundreds of community departments of public safety and health, all of which have invested in and depend upon the TIS service to keep them informed and safe.

Accommodations could include:

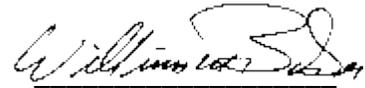
___ Relaxation in TIS-to-broadcaster separation parameters that would parallel those afforded to the broadcasters themselves. This would open more frequencies for TIS licensing and would assist greatly in places where licensees are required to change frequencies due to new broadcasters going on the air in the expanded band.

___ If broadcasters are afforded relaxed interference requirements and are permitted to increase power levels, TIS stations - which are secondary - will be vulnerable. They will receive additional interference from broadcasters. This will be true for TIS stations in the 530-1600 kHz band as well as in the expanded band. TIS stations might require additional output power and field intensity merely to maintain their existing coverage areas.

___ If TIS stations are uprooted due to new broadcasters entering the expanded band, it is critical that alternate frequencies be available for TIS's to migrate to. In most metropolitan areas, the entry of a new expanded band broadcaster would make it necessary for many TIS stations to change channels or go dark. For example, the recent entry of WRGR on AM 1700 just north of New York City in 2015 required such accommodations by eleven TIS stations in New York and nearby New Jersey. Each of the stations had an alternate frequency available, but in some parts of the US today, there are no alternate frequencies on which a TIS can license. Many would be required to go off the air. The availability of 1710 kHz for TIS licensing should be considered for this reason. The 1710 frequency has already been assigned to a TIS station that was forced to change frequencies when a new expanded band broadcaster went on the air but alternate TIS frequencies were not available. The 1710 frequency is also allowed by FCC/NTIA at this time for new federal TIS applicants that want to license where regular federally assigned TIS channels are not available.

In summary, the American Association of Information Radio Operators believes that expanded use of the expanded band will not result in a revitalization of the AM radio service. That is, it will not attract a significant number of additional listeners or improve the revenue environment for station owners. But if such efforts would be undertaken, we would ask that the TIS service, which the FCC has given a home on the AM band for 40 years, would be spared degradation - for the sake of the agencies that operate TIS stations and for the millions of taxpayers served.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "William W. Baker", written over a horizontal line.

William W. Baker
President

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