

The American Association of Information Radio Operators (AAIRO.org) represents more than 300 local governments in the United States that operate 10-watt AM Travelers' Information Radio Stations (TIS) in their cities, counties, tribal communities, parks, airports and thoroughfares. Many of the stations have been established specifically for use during anticipated emergencies in which conventional power and communications could be disrupted – for example: hurricanes and storms, floods, landslides, earthquakes, wildfires, terrorist attacks, etc. Though secondary, safety officials who operate these stations consider them to be primary, and the last line of defense in keeping the public informed when situations turn tragic. They operate when the grid power, internet and other communications are off line. TIS stations have saved countless lives and informed millions in Hurricanes Katrina, Sandy and many other recent catastrophic events.

AAIRO is opposed to this proposal for all-digital AM broadcasting due to its potential for increased analog interference, because of its expense and because the proposal is years – if not decades – too late to achieve its goals.

Risk to Public Safety: Ten-watt TIS radio signals are low power/analog, and highly vulnerable now to interference from adjacent and co-channel broadcast stations, power lines and a plethora of new ambient interference sources that appear every day. All digital radio will only add to the noise environment these stations must operate in. Multi-stream, all-digital AM is similar in bandwidth to the hybrid/IBOC introduced a decade ago, which compromised the range of many community TIS stations and forced others off air, especially in major cities. The impact on what has become a critical TIS service will be most negative if new all-digital stations are allowed to inhabit the expanded band where most TIS stations operate.

Negative ROI: The tepid interest the public has demonstrated in purchasing the current “HD Radio” receiver for home or auto has been well documented. The public is flooded with high quality entertainment sources already. In surveys, in fact, most people do not know what the HD Radio service is, after more than a decade of promotion. And correspondingly, there is a good reason that only 5% of all the AM broadcasters added the hybrid service when it was introduced. The Return on Investment for both the broadcaster and the radio listener is neutral to negative. Why invest in a “HD Radio” when there is an almost infinite amount of high quality music and talk programming on radio and the internet already? Music listeners will not be back to AM even if it were to match or exceed the quality of FM. And news/talk listeners will monitor that format no matter which band it's on, because quality is not such an issue for voice. Meanwhile radio listeners from both bands are slowly bleeding to stream-based entertainment sources. So, in reality, this “band aid” for AM is about 40 years too late.

Yet it is well known that the analog AM radio service still plays a vital role in the United States as a disseminator of information – especially in times of trouble. Please allow it to continue to do so – without disruption.

American Association of Information Radio Operators
Board of Directors
(Bill Baker, Jim Zoss, Jeff Braun, Mike Williams, Linda Folland)
www.aairo.org

From Idyllwild Fire Protection District:

“We agree 100% with the comments contained within this e-mail.

“Let us go a little further with regards to remote locations in our country. Our location for example is surround by a National Forest and we are prone to wildfires. When weather conditions exist such as high winds and single digit humidity, our local power company as part of their fire mitigation plan will cut the power to our region. We all know too well just how well modern technology works without power, not well at all!

“It is for the reasons we mention that maintaining TIS type stations is a vital asset in times of an emergency. Our local station (WNKI578) was able to maintain 100% on air status during the Cranston Fire of 2018 in Riverside County, even when the power was out for several days. Other commercial stations were off the air and our local population was heavily impacted by the inability of modern forms of communications to perform without their power sources.

“Please review the attached press release recalling the operations station WNKI578 performed during the Cranston Fire of 2018.

“Best Regards,

“Bill Tell KD6KTV

“WNKI578-1610AM Director

“Idyllwild Fire Protection District”

“**WNKI 578-1610 AM** A dba of Mile High Radio Club PO Box 1204, Idyllwild, CA 92549-1204 E-mail: mhrc@arrrl.net www.milehighradioclub.org A 501 (c) 3 non-profit organization
Tax ID Number: 33-0861905

Press Release – 08-06-2018

“Cranston Fire – WNKI578-1610AM – Idyllwild

WINKY remained fully operational throughout the Cranston Fire. To date, thirty updates have been broadcast over the airways of 1610 AM throughout the greater Idyllwild area. Even when other local commercial FM broadcast stations went off the air due to the extended power outage effecting our area; WNKI578-1610AM remained on the air with 24/7 broadcast updates of emergency evacuation orders and escape routes.

“The reader must know a vast majority of the entire mountain was without power for several days. Temperatures were 90 plus degrees, internet was not operational for many, there was no nightly news, nor were the telephones fully functional. For us at station WNKI, our source of communications was direct one on one within the Fire Department or via Ham Radio communicating with the Riverside County EOC – RACES operations all on an emergency power supply.

“The very first emergency broadcast updates over 1610 AM were performed with live voice recordings. The early hours of our efforts were very fluid as the dynamics seemed to evolve every 30 minutes with new evacuation orders for each new update. As Wednesday wore on and Thursday rolled around we

began expanding the messages and their content. At that point we switched to “Text to Voice” software allowing for a perfected broadcast to the listeners.

As our communities were allowed to re-populate WINKY began providing travel instructions in and out of the various locations as instructed by Caltrans and the California Highway Patrol. In addition, we reminded those returning home of the extended power outage and to clear their food supplies of any perishables.

“Our corroborated broadcast operations were the result of working directly with the Idyllwild Fire Protection District, US Forest Service, Riverside County Emergency Management Department – EOC and RACES operations along with Caltrans and the California Highway Patrol. We also supported several safety and welfare broadcasted messages via details from non-governmental operations such as Southern California Edison and the Red Cross.

Over the next couple of weeks our team will be assessing their performance of communications, an after action of the Cranston Fire event will be prepared.

“Bill Tell KD6KTV and Roland Gaebert KE6NPN
“For Station WNKI578-1610AM and the Mile High Radio Club”

From Oakland County Michigan Homeland Security:

“I support AAIRO’s position to oppose a digital format for AM radio. AM radio is the simplest, most direct means to communicate broadly with our population during emergencies and such a move would render our transmitter obsolete. I have not listened to music on AM since the 1970s but I do listen to talk radio and sports. There is very little value to make the change but there is a significant negative impact on our existing infrastructure for this proposed change to occur.

“Respectfully,



Kevin Scheid
Chief of Emergency Management
1200 N Telegraph Bldg 47W Pontiac MI 48341
phone 248.858.1724/ fax 248.858.5550
scheidk@oakgov.com

OAKLAND COUNTY HOMELAND SECURITY DIVISION



From Avon Grove Regional Emergency Management:

“As an organization that operates a TIS station using current analog AM broadcast signals, we dot NOT agree with the proposal for a change to the AM service from an analog to a fully digital based service.

“A digital signal, in our actual experience with public service radio systems, has a very sharp “rolloff” at the edge of the coverage range. This necessitates additional transmitters to reach the same “audience”,

at higher ongoing operating costs.

“In contrast, our analog signal on AM1670 is still understandable, albeit at a higher listening volume, at the edges as well as in hard to reach areas across our rural coverage area.

“Homeowners in our coverage area have their AM car radios and inexpensive AM emergency radios (powered via solar, battery, or crank power) that can pick up our signal outdoors and can get some measure of indoor coverage as well.

“This means that our messages can reach mobile as well as many stationary locations throughout our service area. A critical feature during severe weather and other emergency scenarios where other services are unavailable.

“Our station was put into place to address communication needs after several long-term power outages, where internet and cellular service were compromised in a significant way.

“Any service change which would impair our ability to provide this much needed capability, increase our operating costs, and increase our community’s costs and ability to receive our signal are an unacceptable tradeoff for what seems to be both a questionable short, and long-term value proposition.

“We urge the FCC to decline this proposal. It would dramatically impact a much more critical public service than would be provided by the proposed service change.

“Sent on behalf of our organization and the seven municipalities in Southeastern PA that we serve.

“Regards,

“David L Flad

“Vice President

“AGREM, Inc.

“AGREM is a recognized state and Federal non-profit 501(c)(3) corporation. “

From Paul Dobosz of PD Technologies LLC:

“BACKGROUND

“This comment is in response to a petition by Bryan Broadcasting before the FCC to allow AM broadcast stations to cease their Amplitude Modulated (AM) transmissions and transmit solely using the MA3 full digital mode in place of the current AM or Hybrid Digital (HD) MA1 modes.

“PD Technologies, who’s principal is the holder of FCC Commercial Radiotelephone and Radiotelegraph licenses as well as an Amateur Extra class license, has 5 decades of experience on both the receiver and transmitter side of the AM broadcast industry. Utilizing this extensive experience PD Technologies provides engineering services to TIS and HAR information stations and suppliers operating in the AM band under FCC Part 90 licenses. TECHNICAL CONSIDERATIONS

“PD Technologies believes this proposal is ill advised and will create destructive interference along with loss of service to a large number of the current AM listeners and will be particularly destructive to TIS and HAR information stations that operate at substantially lower power levels than standard broadcast stations. The current hybrid MA1 signals, despite greatly reduced digital sideband power levels, cause harmful interference to the first adjacent AM frequencies and in some cases even noticeable interference to the second adjacent frequencies. Raising the power level of these already harmful sidebands with a high duty cycle digital signal will only exacerbate the situation. Plainly put, full power MA3 emissions are not compatible with standard AM stations adjacent to their operating frequency.

“One only needs to look at the NRSC mask for MA3 operation to realize that the permitted digital sidebands not only fill the assigned channel but spill over well into adjacent channels in essence raising the noise floor and degrading reception of at least two additional channels. Once a significant number of stations begin MA3 mode transmissions the entire band will slowly experience a rise in noise level due to digital spillover.

“PRACTICAL CONSIDERATIONS

“In addition to the purely technical reasons this proposed change is flawed and should be rejected we would offer the following common sense assessment of why this change is not in the best interests of the majority of AM broadcasters and listeners.

“AM Radio is the most basic and universal means of communicating with the public in time of disaster and emergency. There are an immense number of battery operated portable receivers capable of receiving AM broadcasts in the hands of the public. Essentially 100% of cars and trucks have in-dash AM radios. In addition to community, state, and independent civic and governmental agencies that operate TIS and HAR stations there are large footprint regional AM stations that provide coverage over wide expanses of the population and land mass.

“The penetration of nonautomotive digital capable emergency receivers is next to zero and automotive market penetration of HD capable receivers has been exaggerated by statistical gamesmanship. We recently purchased two new high end passenger vehicles neither of which offered HD radio despite having mobile hotspots, streaming capability, and satellite radio available. HD was not an available option at any price.

“The final flaw of all-digital is the very nature of digital signals where weak signals quit completely rather than descending to the noise floor gradually. Noisy AM signals are still listenable when digital signals are completely gone. This is critical in times of natural disaster when listeners rely on AM radio.

“The inconvenient truth is that a substantial HD digital listener base does not exist nor does consumer demand for the medium. Causing harm to the vast majority of AM listeners to satisfy deep pocketed broadcast group owners and to generate IP licensing revenue for a proprietary technology is a solution looking for a problem. Sadly, it adds to the original problems instead of solving them.

“There is no denial that noise on the band has risen, making AM reception more challenging. Adding more digital noise to what is already there is not the answer for the majority of AM stations that serve local communities. The FCC is, in part, responsible for the mess because of a lack of vigorous enforcement of FCC Part 15.

“If the Commission feels compelled to grant authorization for MA3 operation in the AM band, I would urge them to allocate new spectrum for the service rather than degrading a valuable existing service.

Paul Dobosz Principal/Consultant PD Technologies LLC 6444 Hidden Hollow Ln Holland, MI 49423-7901
317-750-8437 pjdobosz@gmail.com

From Tolomato Community Development District:

"I agree with the comments from the AAIRO.

"Lee M. Hovis

"Operations Manager

"Tolomato Community Development District

"www.Nocatee.com

"904-924-6853 direct

"904-924-6879 fax

