

**BEFORE THE FEDERAL COMMUNICATIONS
COMMISSION, Washington D.C.**

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In the matter of RM-9419 to allow
certain AM licensees to be able to
operate FM translators.

COMMENTS

1. I am filing these comments to oppose the American Community AM Broadcasters Association's (ACAMBA) petition. This petition calls for AM broadcasters which meets certain power qualifications and have no FM station in the same market to be able to obtain FM translators in order to provide nighttime service.
2. The AM service (formerly known as the Standard Broadcasting Service) has been in existence since the 1920's. The original AM stations were only licensed on one of two frequencies. Stations were subject to interference. Due to the interference caused by co-channel stations, more channels were created. In my generation, the FCC spearheaded the expansion of the AM broadcast band to 1700kHz in an effort to reduce interference.
3. The bottom line is that interference is a reality. When a licensee originally was granted their broadcast license, they should have known their station was subject to nighttime interference.
4. Back in the 80's, the broadcasters hung themselves by demanding that additional stations be given nighttime authority on designated clear-channel frequencies. For example, here in Phoenix, we have a station on 740kHz. This station used to be a daytime only station back when it was KMEO(AM). The station now has unlimited authority with reduced power and a directional antenna. The station can not be heard 8 miles away because of interference from KCBS(AM), San Francisco. The reason, 740kHz is a clear channel. There really is no need for this station in Phoenix to be operating at night on 740kHz.
5. By allowing the AM stations to operate FM translators, we are granting them a service area that they were not entitled to in the first place. I also see this petition as an attempt to allow the AM stations to be allowed to simulcast on FM, a practice that I thought was banned many years ago so the FM band would be able to diverse from AM when AM was the primary broadcasting band. Allowing AM

stations to operate FM translators would give these stations an unfair advantage over their higher powered AM counterparts.

6. The Commission is currently considering RM-9208 and RM-9242 which would permit the licensing of Low Power FM (LPFM) stations. Any action on this petition should be stayed until the RM-9208 and RM-9242 proceedings are completed.
7. The AM community should look at other methods of extending their nighttime service. These could include petitioning the Commission to allow for synchronous operation of AM stations on the same channel or the possibility of migrating lower power AM broadcast stations to 5 kHz channels (such as 1235, 1245, 1255, 1265, etc.). This is currently being done by some stations in the Caribbean.
8. I would support this petition if the Commission would consider my previous petition to allow LPFM stations (undocketed proceeding) to use FM frequencies in the 82-88MHz band where no NTSC Channel 6 is in operation. These AM stations can also apply for channels in this band.
9. I oppose the position ACAMBA takes on arbitrarily relocating non-commercial translators carrying satellite-fed programming to another channel between 201-220. This tells me that ACAMBA is asking for something more than secondary status for their FM translator stations. While I don't approve of these non-commercial satellite-fed translators, I have to defend their secondary allocation to their licensed channel.
10. In conclusion, lower powered AM stations were designed to provide a daytime service to local listeners during the prime listening hours while clear channel AM stations provided a nighttime service over a wide area. These stations knew this when they were issued their licenses. There have been interference problems since KDKA in 1922. The Commission should look at alternatives such as synchronous operation (which works in the UK) and 5 kHz channeling (which works in the Caribbean). The Commission specifically banned FM simulcasting of AM stations many years ago.

Respectfully Submitted,

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January 15, 1999