

3. AM DAB will create a new consumer hardship⁶ by requiring the purchase of new radios to receive the signals. Consumers are already being forced to purchase a DTV receiver⁷ or set-top converter to continue to receive television broadcasts after the DTV transition is completed. Some consumers have suggested that the Commission encourage and even enforce rules requiring receiver manufacturers to include AM Stereo, AMAX and even Digital Signal Processing (DSP) in quality AM receivers⁸.

4. With digital service available only during daytime hours as proposed, the new service is not very likely to gain acceptance⁹. There were concerns about stations that intentionally or unintentionally fail to turn off their digital signal at night creating interference on the band.

5. Consumers agree with REC that AM IBOC increases the station's bandwidth and creates overlapping signals¹⁰. Although, this may work in theory within the station's protected service area, the implementation of an AM IBOC system will destroy AM listening in rural areas¹¹.

6 - *Comments of Robert Foxworth* - "I feel this is a contravening of the rights of this class of listener without due process"

7 - *Comments of Guy T. Falsetti* - "My radios all work fine and I don't have money to buy new ones. Getting a Digital TV will just about wipe me out. Don't put further burden on the taxpayer." *Comments of Vicki J. Redding* - "I believe that this is not in the customers or radio listeners best interest to be forced to buy all new equipment to listen to the radio."

8 - *Comments of Russell Skadl* - "Make them include AM Stereo wherever FM Stereo is available. Encourage them to put better antennas on the radios. Have them use DSP and noise blanking. Enforce AMAX audio bandwidth standards on quality receivers."

9 - *Comments of J. S. Gilstrap Jr.* - "Considering the cost of the receivers, power consumption, lack of available technology for small portables and daytime use only, leaves a very steep hill for IBOC on AM to climb to gain the public's adoption, much more so than AM Stereo ever had." *Comments of Thomas R. Mourgos* - "Please approve requirements to incorporate AM-Stereo along with a wide/narrow switch and AMAX compatibility to radios which have FM-Stereo." *Comments of Neal Newman* - "We have a great mode in C-Quam for AM stations if the FCC would mandate AM Stereo receivers." *Comments of John Pavlica Jr.* - "I suggest that the FCC enforce, or encourage, enhanced analog AM radio transmitter and receiver improvements"

10 - *Comments of Robert Meuser* - "A fully implemented hybrid mode IBOC system would have all stations overlapping twice." *Comments of Tom Bryant* - "the daytime-only provision immediately makes it unworkable. Further, the drastically reduced coverage areas projected are unacceptable." *Comments of Kit Sage* - "IBOC should not be used for AM because it will not work at night. The NAB and the NRSC have already made that determination."

6. Some consumers are concerned that such a system could hamper our international relations with Canada¹², Mexico and could even create a national security issue with Cuba¹³.

7. Commenters in this proceeding have also expressed concerns about the equipment expense that will be involved for some AM stations, which are already losing money and having to depend on satellite programming¹⁴ to stay afloat. We remind the Commission, that the "big-radio" backed¹⁵ iBiquity's proposed royalty¹⁶ rates are unacceptable to small market and minority-owned urban AM stations.

11 - *Comments of Scott A. Todd* - "Furthermore, I live in a rural area, and would be out of range of any reliable medium wave broadcasts, as the dismal tests at WTOP would suggest." *Comments of Glenn Hauser* - "I will no longer be able to listen to stations I can presently hear, some of which have relatively weak signals." *Comments of Bruce A. Conti* - "I am concerned about adjacent channel interference caused by the use of wideband digital on the AM broadcast band." *Comments of Kevin Redding* - "The problem I perceive is that first it is not backwardsly compatible with current technology and will cause a tremendous amount of interference with analog and AM stereo signals."

12 - *Comments of Phillip Rafuse* - "the implementation of the IBOC system in the USA will result in significant interference to Canadian Border stations by day."

13 - *Comments of Frederick Vobbe* - "Should AM stations in the U.S. cause unacceptable interference to stations in other countries, the issue could cause problems or even retaliation (Cuba)"

14 - *Comments of John J. Rieger* - "This might kill off smaller marginal broadcasters who have resorted to voice tracking, satellite programming, farming out this/that."

15 - *Comments of WMTA-AM* - "The FCC should and must involved the US Department of Commerce, Department of Justice and the US Congress in this decision making process before forcing independent radio stations (what few are left after the Telecom Act of 1996) to begin operating at the mercy of the giant broadcasting consolidators."

16 - *Comments of Frederick Vobbe* - "I also feel that iBiquity fee for use in addition to the cost of equipment is a poor idea. I support iBiquity's right to charge for their equipment at a price where they can make profit and pay for past R&D. However license fee to use this equipment after it has been purchased, (especially if the Commission mandates its use), is monopolistic and is a conflict of interest between government and private business."

8. The mission of the FCC is to serve the public interest. In our opinion, that means that the Commission must adopt rules that not only provide the public with access to emerging technology but also continued access to existing technology by not creating hardships through the purchase of new radio equipment and making the existing radio equipment for the band that has had the most receivers ever manufactured for it become obsolete.

9. The public interest is also served by the needs of the broadcaster. Broadcasters are subject to competition by DARS and eventually, the mobile Internet. Broadcasters do deserve a level playing field to DARS. REC feels that such a level playing field should not be done at the expense of the existing analog service. REC feels that the public interest would be served by allotting new spectrum for a Digital Audio Broadcasting service.

10. The listeners of AM radio have spoken. They have said that a change to AM radio technology is not needed but instead, encourage and even mandate the use of existing technology (AM Stereo, AMAX, etc.) in the AM band. REC will not allow rural America and urban minorities to suffer at the hands of big-city digital radio.

Respectfully Submitted:

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