

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. Safety officials who operate the stations consider them to be the last line of defense in keeping the public informed when situations turn tragic. TIS stations have saved countless lives in Hurricanes Katrina, Sandy and in western wildfires.

**AAIRO is opposed to this proposal for all-digital AM broadcasting due to its potential for increased adjacent-channel AM-band 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 highly vulnerable to interference from adjacent and co-channel broadcast stations, power lines and a plethora of new ambient sources. Adding the potential for a drastic increase in interference from new all-digital broadcast stations, which will occupy up to four times the bandwidth of analog AM stations, would compromise these TIS stations' range and force many of them off the air, as happened when certain AM broadcasters adopted the IBOC standards some years ago. Especially in urban areas, TIS stations are on radio channels adjacent to powerful local broadcast stations, which, if they were to increase their bandwidths (as this proposal dictates), would swamp their TIS neighbors with digital hash, forcing them off the air en masse. (See the accompanying analysis from consultant Paul Dobosz.)

Negative ROI: The tepid interest the public has demonstrated in purchasing expensive "HD Radio" receivers (associated with the current hybrid IBOC digital service) has been well documented. And correspondingly, there is a good reason that only 5% of all the AM broadcasters added IBOC service, when it was introduced - and why many in that small group later abandoned it. The Return on Investment for both the broadcaster and the radio listener is negative. To proceed with this proposal would predictably replicate the "IBOC debacle," except that the impact on the band itself will be decidedly worse, chasing to other services many of the remaining listeners that AM has.

Face the Music: In the real world, virtually no one uses AM for musical entertainment. Radio listeners learned forty years ago that they can find AM radio's musical content replicated in high quality stereo on FM; and now on internet streams, satellite radio and from dozens of other sources as well. Music listeners will not be back to AM. Therefore, this effort to bolster the quality of AM signals so late in the game is futile.

But the AM radio service still plays a special role in the United States as a disseminator of information – especially in times of trouble. **Please allow it to continue to do so – without interference.**