**Before the**
**Federal Communications Commission**
**Washington, D.C. 20554**

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| In the Matter of | ) | |
| | ) | GN Docket No. 25-133 |
| Delete, Delete, Delete | ) | |

# REPLY COMMENTS OF THE SOCIETY OF BROADCAST ENGINEERS, INC.

The Society of Broadcast Engineers, Inc. ("SBE")[1] submits these reply comments in response to the Public Notice (the "Notice")[2] issued in the above-captioned proceeding, as well as various of the opening comments submitted in response thereto. SBE filed opening comments in the proceeding calling for elimination or revision of several outdated regulations setting minimum distance separation requirements between FM stations,[3] and was pleased to see that several other commenters agreed with SBE's position.[4] SBE additionally agrees with the comments of the National Association of Broadcasters ("NAB") and others seeking elimination of AM minimum efficiency standards, authorization requirements for applications in the expanded AM band (1605-

[1] SBE is a professional organization of television and radio engineers and those in related fields, with more than 4,000 members in 117 chapters worldwide.

[2] Public Notice, *In re Delete, Delete, Delete,* DA 25-219 (Rel. Mar. 12, 2025).

[3] Comments of the Society of Broadcast Engineers, Inc., GN Docket No. 25-133 (Apr. 11, 2025).

[4] *See, e.g.*, Comments of Chuck Anderson, GN Docket No. 25-133, at 2-4 (Apr. 11, 2025) ("Anderson Comments"); Comments of Michael Radio Company, LLC, GN Docket No. 25-133, at 2 (Apr. 11, 2025); Comments of T Z Sawyer Technical Consultants, GN Docket No. 25-133, at 2-3 (Apr. 11, 2025) ("T Z Sawyer Comments").

1705 kHz), limitations on signal delivery methods for feeding FM translators, and various outdated and unneeded technical definitions.

### A. Eliminate AM Minimum Efficiency Standards.

SBE agrees with NAB that the efficiency standards required of AM radio antennas[5] ("Minimum Efficiency Standards") create a "barrier to entry for AM stations," and unnecessarily limit the use of effective modern AM antennas with little corresponding practical benefit.[6]

The Minimum Efficiency Standards have the real-world effect of requiring AM stations to operate using large towers as part of antenna systems with extensive ground installations, particularly when operating at lower frequencies. Conversely, improved technology has allowed for the design and production of smaller AM antennas systems that can provide sufficient coverage using much smaller structures. Some of these newer antenna systems cannot meet the Minimum Efficiency Standards, and so are not able to be effectively utilized by the industry. If the Minimum Efficiency Standards were removed, however, AM broadcasters would immediately have the opportunity and flexibility to explore new and different antenna site options—particularly in urban or other land-constrained areas.

The practical benefits of the Minimum Efficiency Standards are minimal, and do not outweigh the restrictions the Standards place on AM broadcasters. From a technical standpoint, although the Minimum Efficiency Standards do provide for some reduction in high angle radiation, these types of emissions are already addressed by skywave limits and other interference rules.[7] As such, the nominal benefits provided by the Minimum Efficiency Standards do not outweigh the

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[5] *See* 47 C.F.R. §§ 73.45(b)(2), 73.186(b), 73.189.

[6] *See* NAB Comments, at 57-58.

[7] *See, e.g.*, 47 C.F.R. § 73.182.

significant value to giving AM broadcasters the ability to utilize modern technology to deploy smaller antenna systems in more varied, and potentially more cost-effective locations. SBE also agrees with NAB that AM stations' community of license coverage requirements are sufficient to serve the public interest, and "[p]rimary and secondary coverage areas and interfering signal levels can be determined without specifying any minimum antenna efficiency."[8] This simple but impactful modernization of the AM band is precisely the type of "technological innovation in communications" the Notice seeks to advance, and takes on heightened relevance in light of the Commission's past efforts to "improve the AM service" given its continued position "as a vital source of news and information, as well as a critical lifeline in times of emergencies and man-made or natural disasters."[9] The Commission should consider elimination of the Minimum Efficiency Standards.

**B. Align Authorization Requirements for the Expanded AM Band.**

SBE agrees with NAB that the heightened authorization requirements for the 1605-1705 kHz band (the "Expanded AM Band") should be eliminated because they are unduly complicated and burdensome, and no longer serve a practical purpose.[10]

When the Expanded AM Band was established, a process was created to allow licensees of existing AM stations with impaired signals due to interference to apply for access to operate in

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[8] NAB Comments, at 58.

[9] Notice, at 1-2; *Revitalization of the Am Radio Serv.*, First Report & Order, Further Notice of Proposed Rulemaking, and Notice of Inquiry, 30 FCC Rcd 12145, 12146-47 (2015); *see also Carr Applauds Senate Commerce Passage of AM Radio for Every Vehicle Act* (Feb. 5, 2025), https://docs.fcc.gov/public/attachments/DOC-409371A1.pdf.

[10] *See* NAB Comments, at 58-60.

the Expanded AM Band.[11] That process required such applications to be filed in a window opened by the Commission and to be compared and ranked based on a series of "improvement factors."[12] While this system may have been effective when the Expanded AM Band was first opened, according to NAB the Commission has not opened a filing window for the band in over 20 years, and only 53 stations are currently authorized in the band.[13] In addition, the Commission expressed a preference for nondirectional stations in the initial licensing of the Expanded AM Band for reasons of simplicity that are no longer applicable today[14]—both directional and nondirectional stations should now be allowed, with no preference given to either.

There is no practical or technical reason why applications for access to the Expanded AM Band should be treated differently from applications in the rest of the AM band (subject to limitations established by generally-applicable AM rules[15]), and any need to restrict access to the Expanded AM Band has long been irrelevant. Thus, the Commission should eliminate the alternate application requirements for the Expanded AM Band, and treat all applications for AM broadcast licenses under the same criteria. The Commission may additionally wish to consider limited skywave protection in the Expanded AM Band, as this was part of the criteria that encouraged the existing 53 stations to relocate to the Expanded AM Band.

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[11] *See* Report and Order, *In re Review of the Technical Assignment Criteria for the AM Broadcast Service*, 6 FCC Rcd. 6273 (Rel. Oct. 25, 1991) ("Expanded AM Band Order").

[12] *See* 47 C.F.R. §§ 73.30(b), 73.35.

[13] NAB Comments, at 59.

[14] Expanded AM Band Order, 6 FCC Rcd., at 6303-05, 6340-41.

[15] *See, e.g.*, 47 C.F.R. §§ 73.21(a)(2), 73.26.

### C. Relax Requirements to Feed Audio Signals Over the Air to Certain Translators

A number of commenters have recommended the Commission eliminate or revise its rules requiring that certain FM translators must be fed audio signals over-the-air ("OTA").[16] From a technical standpoint, FM translators can be fed a number of ways, including OTA, satellite, and various alternative terrestrial means. Each delivery mechanism has different technical parameters and operational benefits that may best serve the specific contour and terrain limitations of a given station or translator. In fact, the alternative means of feeding a translator often provide greater audio quality and reliability when compared to OTA delivery.

SBE generally supports allowing broadcasters the flexibility to select and implement the most appropriate audio delivery mechanism for their specific circumstances. To the extent policy reasons currently exist for limiting certain translators to being fed over the air,[17] those reasons can and should be addressed in ways that do not arbitrarily limit the flexibility of FM translator licensees to utilize the most appropriate technical solution for their needs. At a minimum, however, licensees with a current restriction to provide only an OTA signal to a FM translator should be permitted to feed translators by any method so long as an OTA signal can be shown to be received at the location of the FM translator.

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[16] *See, e.g.*, Anderson Comments, at 5; T Z Sawyer Comments, at 1-2; Comments of Bible Broadcasting Network, Inc., GN Docket No. 25-133 (Apr. 11, 2025); Comments of Aaron Ishmael, GN Docket No. 25-133 (Apr. 11, 2025).

[17] *Cf.* Memorandum Opinion & Order, *In re Amendment of Part 74 of the Commission's Rules Concerning FM Translator Stations*, 8 FCC Rcd. 5093, 5098 (Rel. July 28, 1993).

### D. Eliminate Unnecessary and Contradictory Technical Definitions.

SBE agrees with NAB that certain technical definitions persisting in FCC rules are no longer necessary, and at times may be contradictory.[18] In particular, the Commission should eliminate the definitions of combined audio harmonics, incidental phase modulation, stereophonic crosstalk, and stereophonic separation.[19]

## Conclusion

SBE commends the Commission's efforts to identify and eliminate unnecessary or unduly burdensome regulations. By eliminating or revising the interference rules identified in SBE's initial Comments, and addressing the technical items discussed above and identified by NAB and others, the Commission can modernize its regulatory structure to account for current technology, and provide broadcasters with the flexibility needed to increase efficient use of licensed spectrum.

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[18] *See* NAB Comments, at 77-78.

[19] *See* 47 C.F.R. § 73.14.

Respectfully submitted,

**The Society of Broadcast Engineers, Inc.**

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