

CONCURRING STATEMENT OF  
FCC COMMISSIONER JAMES H. QUELLO  
IN WHICH COMMISSIONER ABBOTT WASHBURN JOINS

In re: 9 kHz Spacing in the AM Radio Broadcasting Service

I rather reluctantly concur in our majority vote for reducing the spacing in the AM broadcast service because of the inconclusive showing made on our current record. I have a nagging concern that we might be proposing a course of action which could be counterproductive in terms of overall service to the public.

First, the tests and measurements conducted by NTIA and three of our licensees demonstrate that theoretical projections and practical results quite often differ. The fact is that none of the three stations was able to operate within required parameters after shifting frequency. Despite speculation by the staff that, in one case, "...an engineering study to optimize the parameters would probably correct this problem..." I would prefer greater assurance that we are proceeding with appropriate caution.

Second, I don't believe that the potential impact upon AM stereo has been fully assessed. The task force generally has recognized that it might be necessary to restrict the bandwidth of emissions to 5 kHz "...or some other suitable value..." to avoid unacceptable adjacent channel interference. While it is still possible to have stereo under restricted bandwidth conditions, without adequate audio fidelity, I question its public appeal. With regard to the argument that AM is generally "receiver-limited" in audio quality at the present time, I suspect that any such limitation is largely the result of the many small and inexpensive "pocket" receivers now in use. AM stereo, of course, would be expected to find the bulk of its appeal among the mobile audience and automobile receivers are generally far superior in quality to many of the "pocket" variety. It must also be remembered that AM stereo will have to compete, at least to some extent, with FM stereo which is generally regarded as being of high quality.

I am also very concerned that our proposal will raise unrealistic expectations among potential beneficiaries. In presenting three alternative plans for implementing a 9 kHz spacing plan, the task force acknowledges that their estimates of the number of new stations to be gained are subject to error. In

making its recommendations to the Commission, the task force noted: "The alternative plans assume the United States can assign fulltime stations on all the channels created by reduced spacing. This assumption may not be realistic." The fact that Canada, Mexico and Cuba are likely to insist upon sharing some of these new frequencies, at least in border areas, assures us that we will not be able to use all of the frequencies. Beyond that, such matters as demographics and economics must be considered before any viable assignments are made.

Finally, while reduction in spacing is being advanced as a boon to minority entrepreneurs, the comments--or lack thereof--from minority individuals and organizations would seem to indicate that they don't welcome this proposal with great enthusiasm.

Despite my misgivings, however, I believe all possibilities should be further constructively considered. It is possible these insufficiently addressed questions may eventually be answered favorably and that the facts may then lead to the conclusion that 9 kHz spacing will produce some of the anticipated benefits. I support the Commission's desire to explore the concept of 9 kHz spacing in an international forum wherein the nations of Region 2 will have the opportunity of contributing their views.

Therefore, I concur.