



Critical Steps to AM Revitalization

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Why AM Radio as a Media Resource is Irreplaceable



- During Hurricanes Katrina and Sandy AM Radio Stations With Available Diesel Generator Power Proved to Be the Most Reliable Source of Information
- During the Earthquake in Northern VA that shook downtown Washington, DC AM Radio Stations were again a primary source of news and information when cell sites were totally saturated with users
- AM Radio Stations Cover a Larger Demographic Area Than FM or TV Stations, Particularly at Night Due to Over the Horizon Skywave Coverage



AM Radio is in Dire Straits

- **Listenership fading steadily (<17%)**
 - High levels of reception noise (RFI/EMI)
 - Absolute dominance of FM radio
 - Internet radio, MP3 players, personal devices
- **Total revenue is \$2.2 B but falling**
 - Mostly from large markets, chains (2012 figures)
 - Many small-market stations near failure
- **What's the real problem?**
 - Poor reception conditions, poor AM radio receivers
 - Terrible audio quality (2.5-kHz typical bandwidth, no bass)
 - With the low audio quality, it's hard to program music
 - AM cannot survive with news/talk alone!



Three Paths Forward for AM

- (1) Continue current course:
 - No significant actions; some minor (helpful) Rules changes
- (2) Order analog “sunset”:
 - With sufficient HD radio penetration (2019?)
 - Abrupt, large loss of audience; economic shock
- (3) Three Critical Steps to AM Revitalization
 - Conduct a noise study in the 0.5MHz-2GHz band and review and modify as appropriate the Part-15 and Part-18 EMI regulations
 - Establish AM receiver specs to provide parity with FM
 - Promptly adopt AM synchronization rules

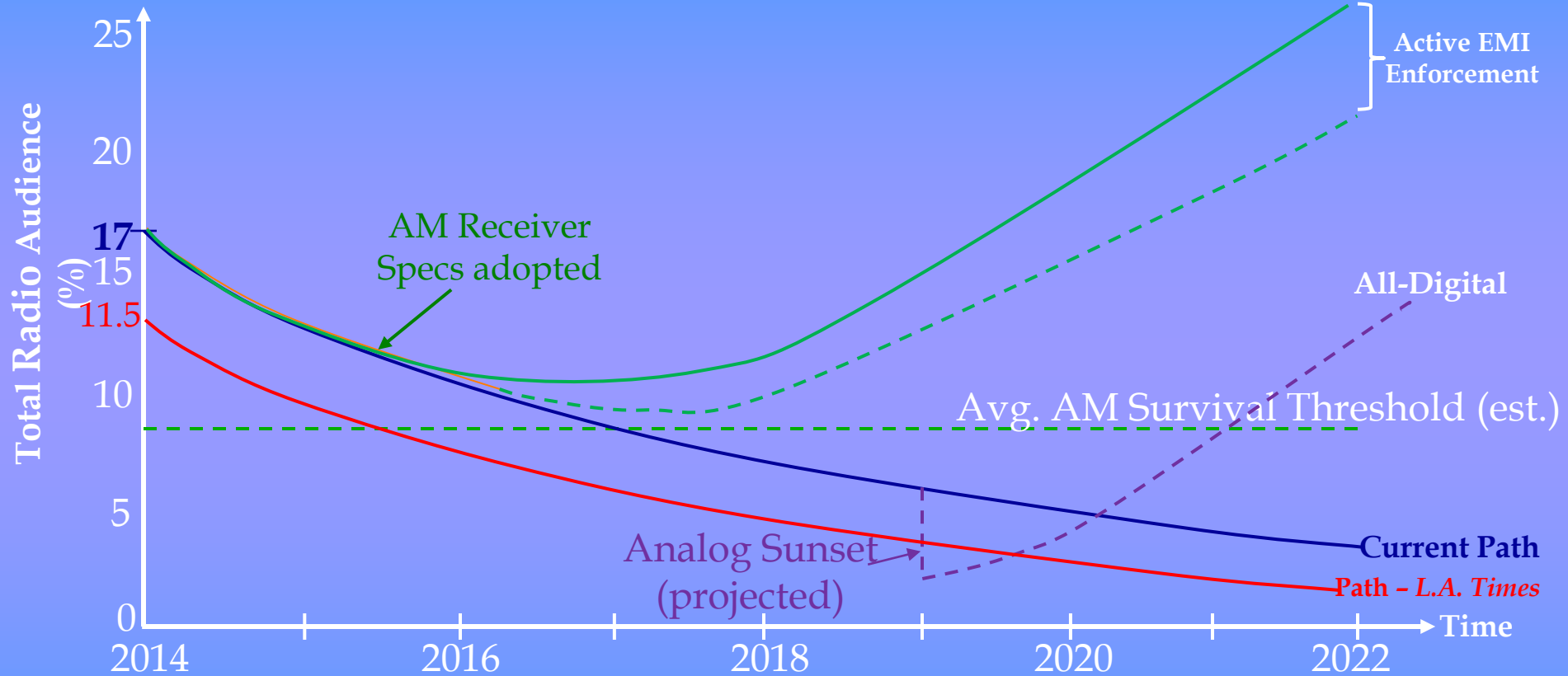
Legal Precedents for Strong Action



- The Commission has proactively managed the broadcast services in the past:
 - Denial of AM stereo in 1961 to assure success for FM
 - Adoption of FM stereo standard (1961)
 - UHF-TV floundering; All-Channel Receiver Act passed (1961)
 - Commission solicited AM stereo proposals (~1979-80)
 - Magnavox CPM system selected (1980); lawsuits threatened
 - Commission adopted “marketplace approach” (1982) ⇒ failure for AM!
 - TV stereo (BTSC) adopted by industry with Commission blessing (1984)
 - AMAX receiver standards (1993); no Commission mandate ⇒ failure
 - Final CQUAM approval in 1993; too late without receiver mandates
- AM has been left to drift too long; the situation is now desperate!
- Industry will not move on its own, so it's up to the Commission to move in the public interest to preserve AM



Projected AM Listenership



- Scenarios versus estimated AM survival share threshold
- Aggressive, prompt action is needed to save AM radio!

Part-15 EMI Enforcement: *"Do or Die" for AM Radio*



- **AM is slowly drowning in a sea of noise (QRM)! Analog & Digital**
 - Power lines (high & low-voltage) – poor maintenance
 - » Bad insulators, bushings, arcing transformers
 - » Ineffective RFI suppression & grounding
 - » Proximity to roads
 - Telephone, cable feeders (DSL, CATV signal leakage)
 - Consumer devices with radiation & shielding issues
 - » Computers, modems, switching power supplies, etc.
 - » Fluorescent & LED lamp ballasts, dimmers
 - » LCD & plasma HDTV sets, home A/V gear

- **The legal solution requires active enforcement now!**
 - **Part-15 Rules need to be re-evaluated respective to the present noise environment:**
 - » Unintentional Radiators (§47 CFR 15, Subparts A & B [15.209, 15.221])
 - » Intentional Radiators (§47 CFR 15, Subparts A & C)
 - » Home devices (Digital Devices Part B)



Part-15 EMI Enforcement: *"Do or Die" for AM Radio*

- FCC Lab should demand valid Part-15 certification from vendors (e.g., Wal-Mart, Sears, Best Buy, Amazon) & *perform random product testing to assure compliance.*
- Noncompliance should result in hefty fines and (in egregious cases) even marketing injunctions.
- AM stations must become actively involved in reporting Utility & Home Device Part-15 offenses to the Commission.
- Public (non-technical) interference complaints would be directed to the affected stations for follow-up.



INSTRUCTIONS FROM FCC COMMISSIONER MIGNON CLYBURN REGARDING INTERFERENCE COMPLAINTS

- · Submit a filing for the public record at <http://apps.fcc.gov/ecfs/>
- o Find the most active open proceedings at <http://fcc.us/1ILis9g>
- o Please note that all submissions are publicly available and searchable on the internet
- · File a complaint about a telecommunications related service at <http://www.fcc.gov/complaints>
- · File a complaint over the phone or ask general questions about the FCC: [\(888\) 225-5322](tel:(888)225-5322)

Ref: Email from Commissioner Clyburn to Tom King dated 12 Nov 2014 at 5:32PM.



RECENT ARTICLES ATTESTING TO BROADBAND SPECTRAL NOISE AS A MAJOR WIRELESS COMMUNICATIONS PROBLEM

- “Electronic Noise is Drowning Out the Internet of Things” by Mark A. Henry, Dennis Roberson & Robert J. Matheson, posted in IEEE Spectrum 18 Aug 2015
- ITU Report entitled “Drowning in a Sea of Man-Made Noise”, IEEE BTS Broadcast Technology Magazine, August 2015



NEED FOR RF NOISE STUDY

- “There hasn’t been a systematic study of radio-frequency noise in the US since the mid-1970’s, when the Institute for Telecommunications Sciences(ITS), a part of the National Telecommunications and Information Administration, last monitored federal use of the radio spectrum.”

* Ref: “Electronic Noise is Drowning Out the Internet of Things” (Note previous slide for details.)

AM Receiver Mandates: *Parity with FM*



- Low internal noise floor
- High overall RF sensitivity, selectivity, and dynamic range
- Highly effective noise (EMI) rejection
- Full 10-kHz audio bandwidth capability with low detector distortion.
- Stereo capability

AM Receiver Mandates: *Parity with FM*



- Audio Bandwidth: 9-10 kHz typical, adaptive with a minimum nominal bandwidth of 7.5 kHz; reduced adaptive bandwidth (~ 3-kHz minimum) permitted in high noise or adjacent-channel interference situations (i.e., nighttime). Variable-Q notch filter @ 10 kHz standard.
- Signal-to-Noise Ratio (SNR): minimum 55 dB, preferably ≥ 60 dB.
- Sensitivity: -120 dBm ($\sim 1 \mu\text{V}$) for 10 dB SNR; $< 20 \mu\text{V}$ for 20-dB SNR.
- Selectivity: 25-50 dB (adaptive, using co-, adjacent-and alternate-channel detection).
- Dynamic Range: ≥ 100 dB.
- Noise Figure/Rejection: ≤ 6 dB; 2-3 dB preferred/ ≥ 30 dB impulse noise rejection.
- Image Rejection: 50 dB or better.
- Intermodulation: IP_2, IP_3 intercepts +10 to +40 dBm.
- IF: low with image-rejecting down-conversion, or alternatively, double (up-down) conversion.
- Stereo Separation: minimum 25 dB, 30 Hz - 10 kHz.
- Antenna: H-field, or combination H & E field, diversity-type preferred.

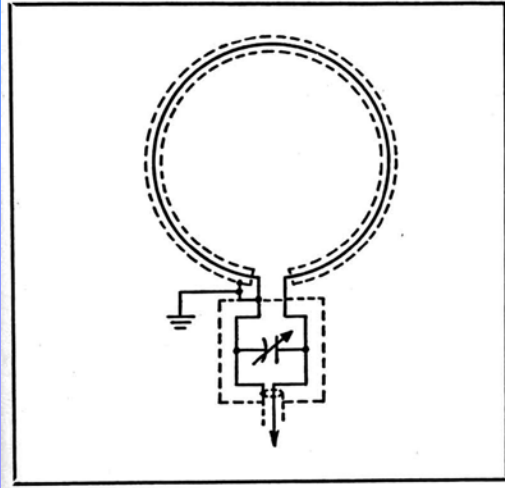
AM Receiver Mandates: *Parity with FM*



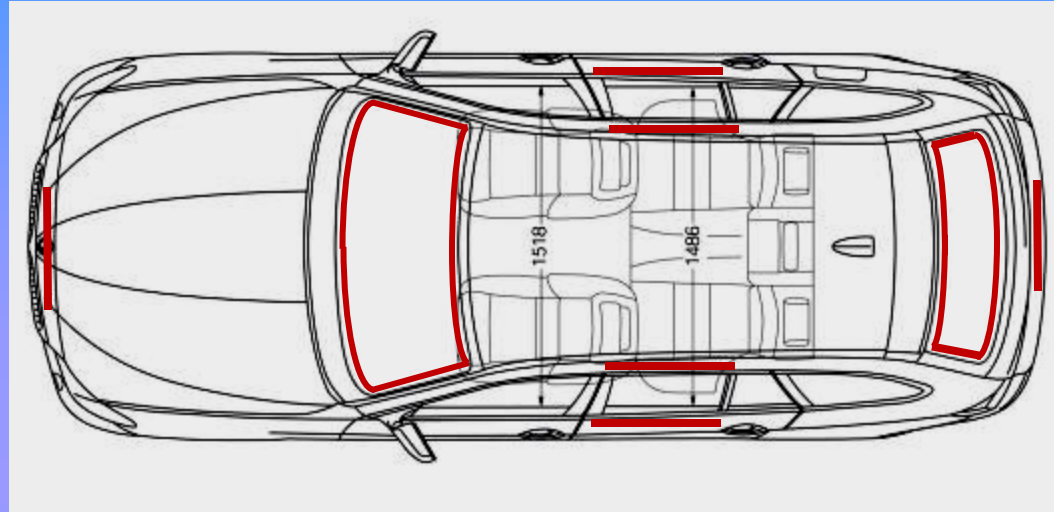
Specification	FM (Current)	AM (Current)	Parity?	AM (New)	Parity?
Audio Bandwidth	15 kHz	2.5 kHz	No!	10 kHz	Close
Signal/Noise	65 dB	35 dB	No!	55 dB	Close
Sensitivity (20 db SNR)	2 μ V	500 μ V	No!	20 μ V	Close
Selectivity (Adj./Alt.)	45/60 dB	40/50 dB	Close	40/50 dB (Adaptive)	Yes
Dynamic Range & Intercepts	100 dB	70 dB/ 0-10 dBm	No!	100 dB/ +10-40 dBm	Yes
NF/Noise Rejection	3/50 dB	14/20 dB	No!	2-3/50 dB	Yes
Image Rejection	60 dB	30-40 dB	Close	50 dB/50 dB	Yes
Stereo Separation	35 dB	-----	No!	25-30 dB	Yes
Antenna	E-field (Fair)	E-field (Poor)	No!	H-field/ Diversity	Yes



Vehicle H-Field Antenna Implementations



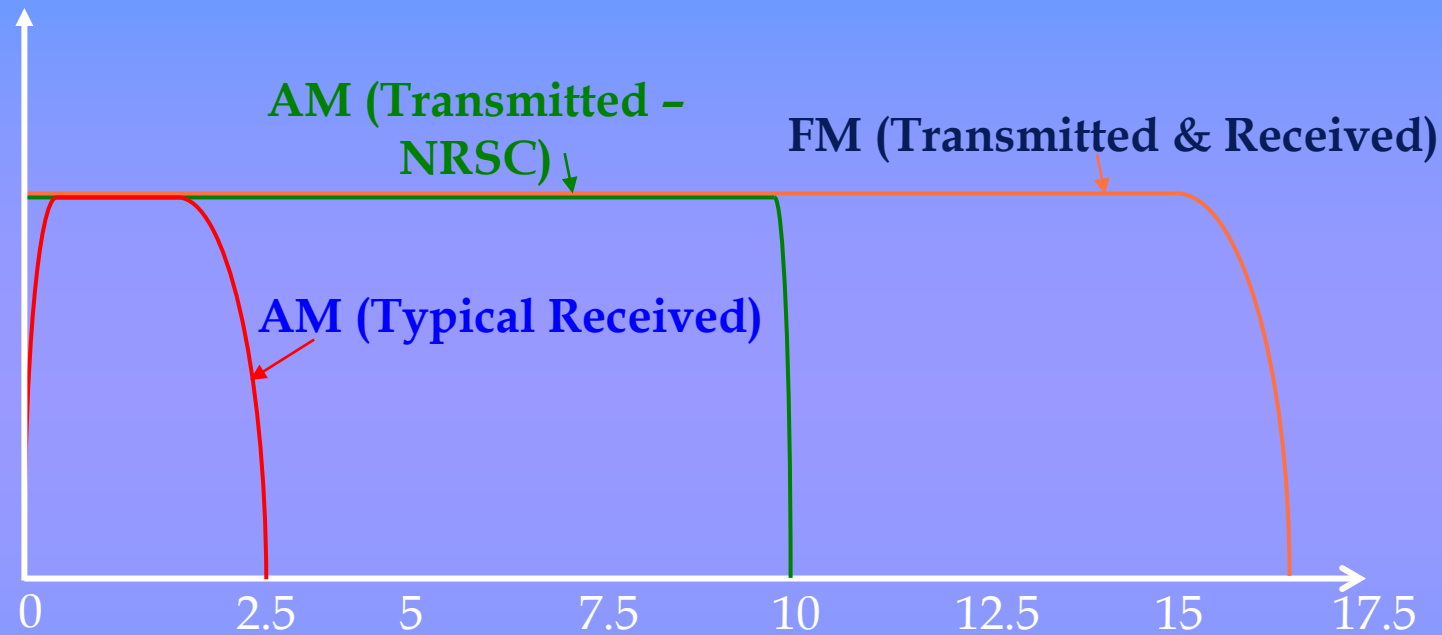
Typical tuned, shielded loop



Potential Loop Locations

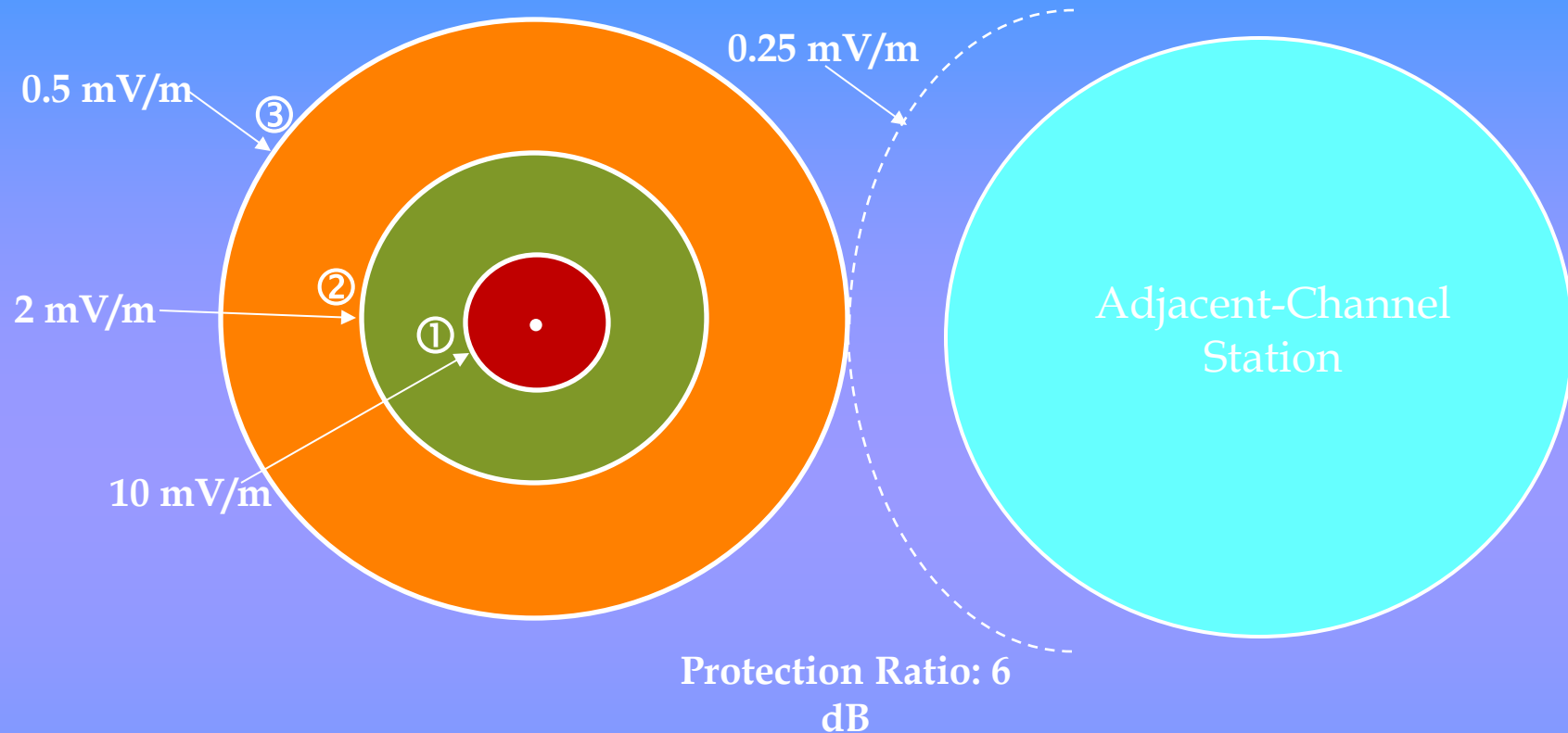
- A shielded loop permits good magnetic (H) field AM signal reception while screening out local E-field noise from auto electronics & power lines.
- Loop-antenna units (including ferrite loopsticks) can be fabricated at low cost and mounted in windshields, windows, trim, and under plastic body panels.
- Multiple air-core units, mounted vertically, can be effectively utilized with standard diversity-combining techniques.
- These AM loops can be configured for good FM reception as well.

FM vs. AM Audio Frequency Response



- FM transmitted & received bandwidth ~ 15 kHz (“full-fidelity”)
- AM transmitted bandwidth (NRSC) ~ 10 kHz (“fine”)
- Typical AM receiver ~ 2.5 kHz + bass rolloff + noise (“telephone-grade”)
- With these conditions, how can AM compete or even survive?

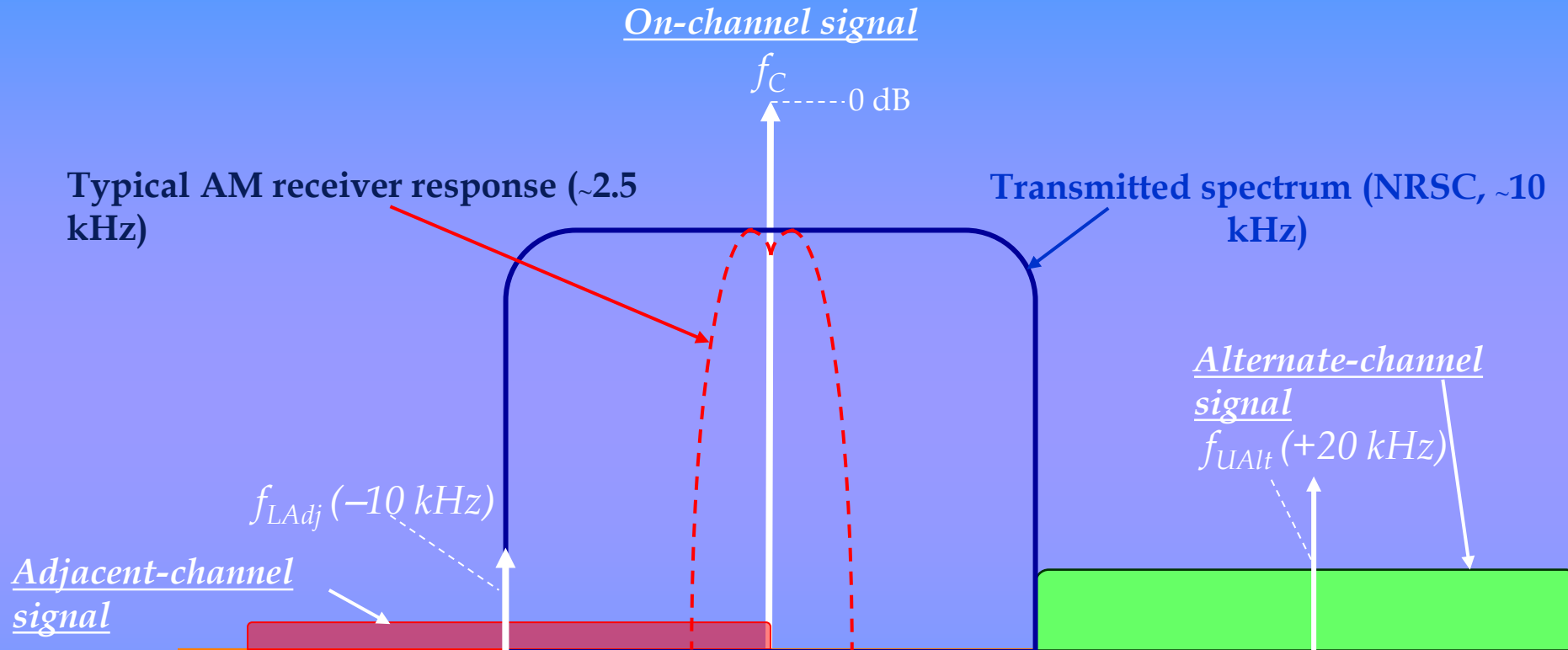
AM Reception Cases



- Contours: (1) Close-in [10 mV/m]; (2) Suburban [2 mV/m]; (3) Fringe [0.5 mV/m].
- Receiver response dependent on relative carrier & modulation levels.
- Dynamic bandwidth, signal cancellation, and audio expansion performed digitally for higher performance plus lower cost & complexity.
- Overall cost/complexity comparable to HD radio implementations.



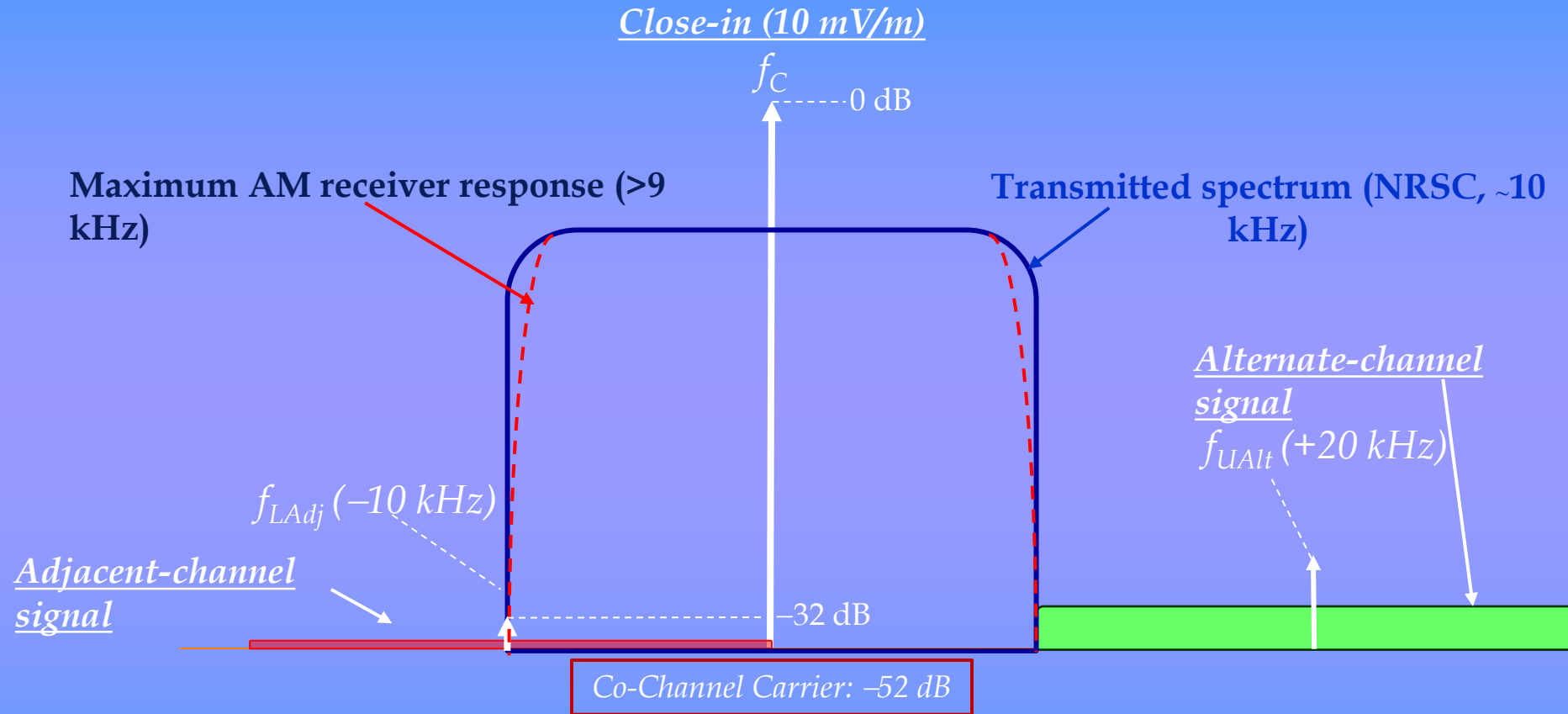
AM Receiver Frequency Response



- Current AM receivers reproduce only $\frac{1}{4}$ of the transmitted bandwidth!
- To “balance” the sound, the bass is cut to compensate for the lack of highs
- Current receivers have no stereo, no noise limiting, poor RF performance



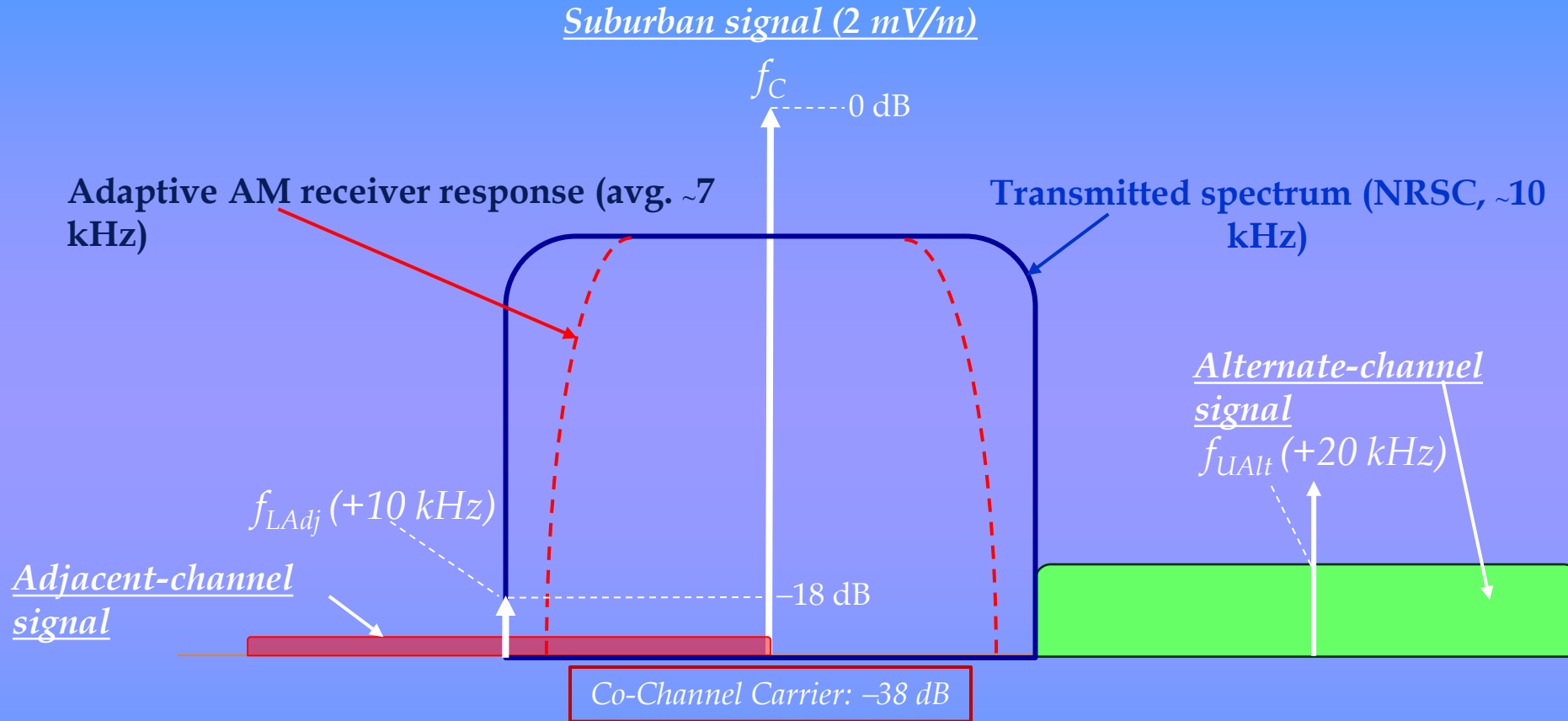
AM Receiver Frequency Response



- New AM receivers can reproduce all of the transmitted bandwidth!
- Flat bass response, extended highs, and full stereo separation (CQUAM)
- Multi-stage noise limiting, low internal receiver noise, H-field antennas



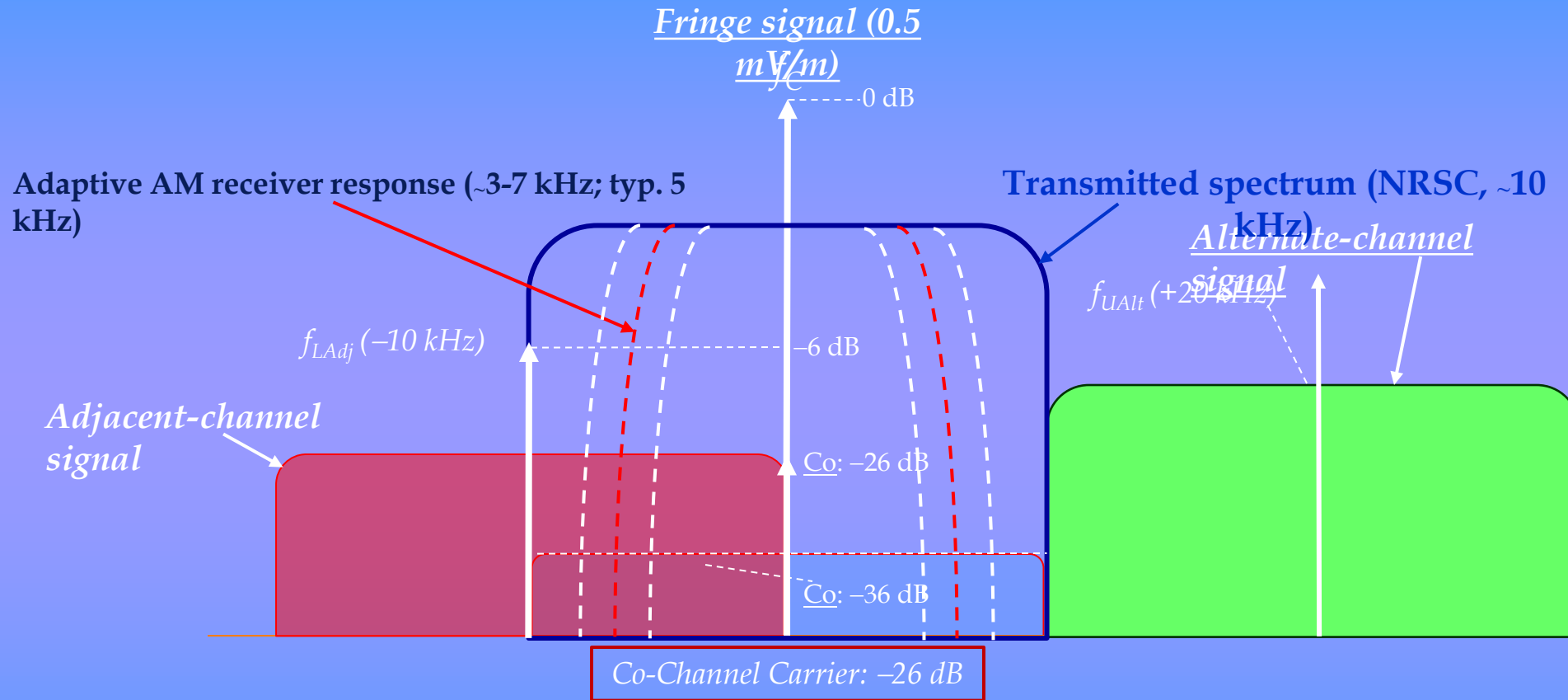
AM Receiver Frequency Response



- Adaptive AM receivers can reproduce most of the transmitted bandwidth!
- Bandwidth dynamically controlled by noise, adjacent- & alternate-channel levels
- Advanced DSP algorithms for optimized reception, adaptive noise reduction



AM Receiver Frequency Response

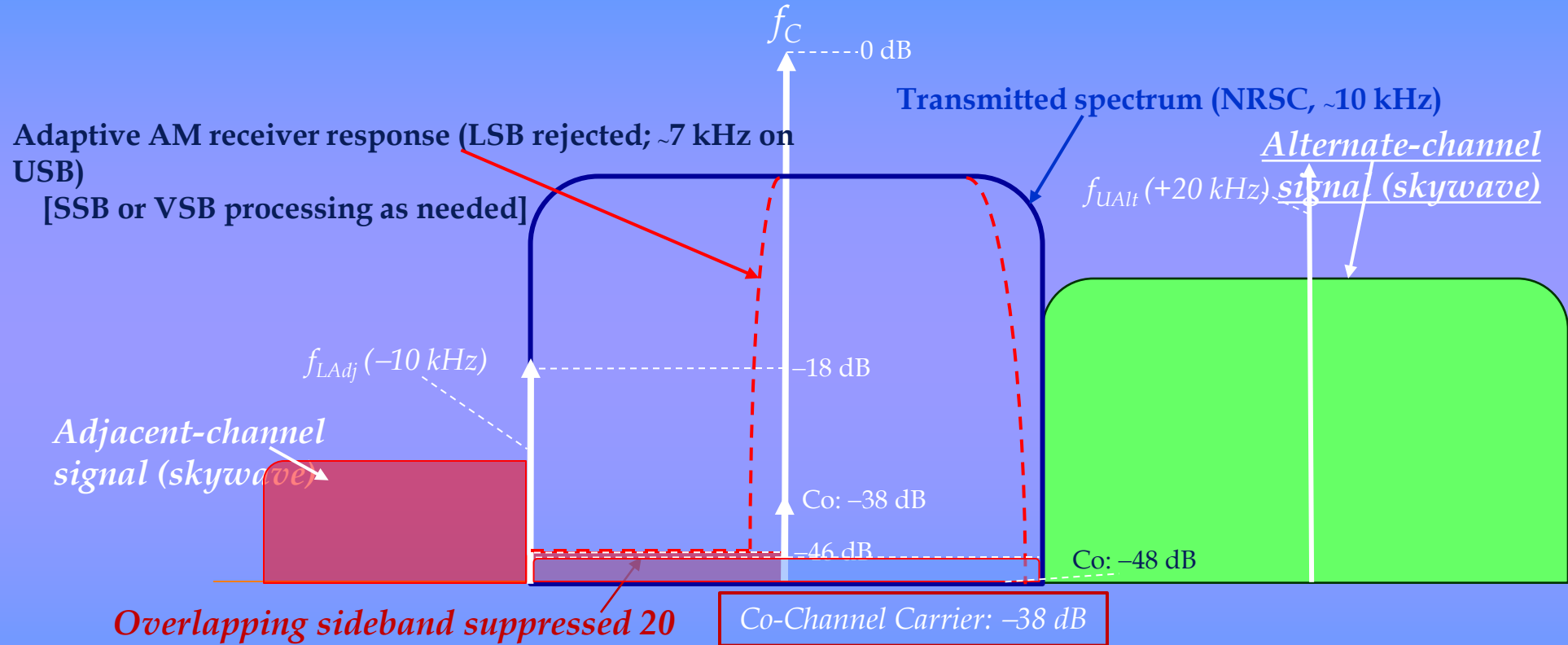


- Adaptive AM receivers can still reproduce most of the transmitted bandwidth!
- Bandwidth dynamically controlled by noise, adjacent- & alternate-channel levels
- Aggressive DSP algorithms for optimized reception, adaptive noise reduction



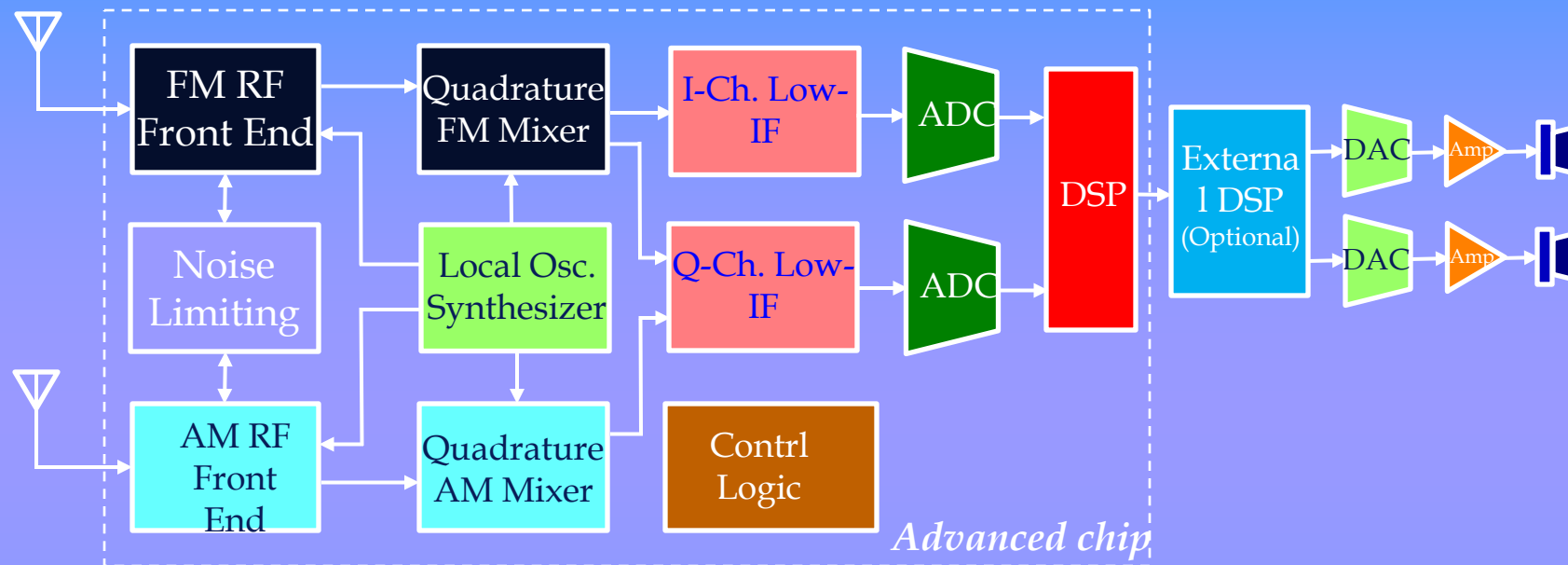
AM Receiver Frequency Response

Suburban nighttime signal (2 mV/m) - Class B



- Adaptive AM receivers can still reproduce most of the transmitted bandwidth!
- Bandwidth dynamically controlled by noise, adjacent- & alternate-channel levels
- Aggressive DSP algorithms for optimized reception, adaptive noise reduction; e.g., asymmetric filtering, SSB/coherent techniques, interference cancellation

Typical Advanced Receiver Architecture

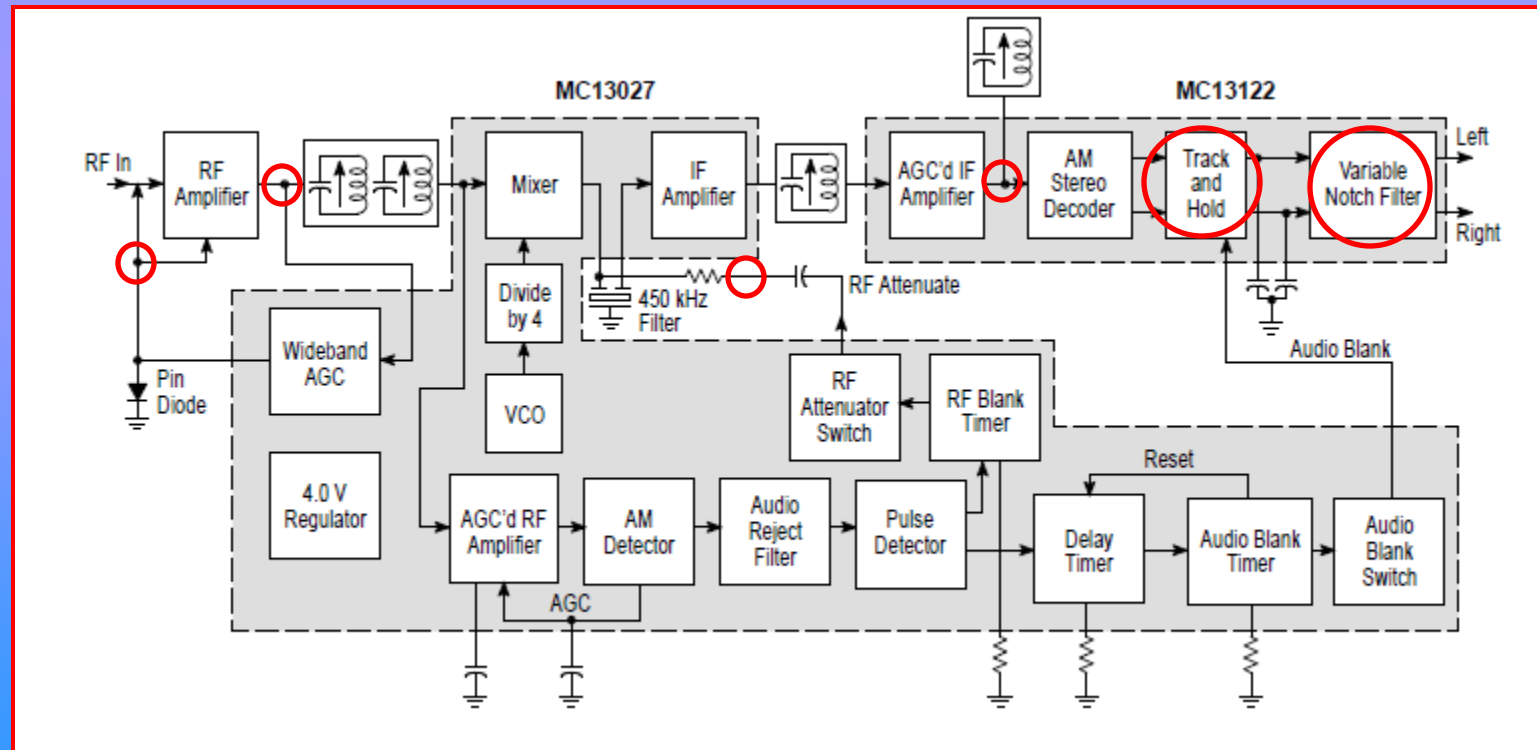


- High-gain, noise-limiting, low-noise Front-End stages (AM & FM)
- Low-IF or Dual-Conversion adaptive-bandwidth architecture
- DSP-based RF/detection adaptive signal processing
- Optional DSP RF/audio signal optimization device



Receiver Noise Rejection

- Multi-stage noise limiting (re Motorola CQUAM chips ~1995)
 - Antenna input/RF front-end (fast clamp, PIN diode)
 - Mixer output (triggered blanker)
 - IF output/Detector input (delayed blanker)
 - Audio output (delayed sample-&-hold)
 - Variable 10-kHz notch filter



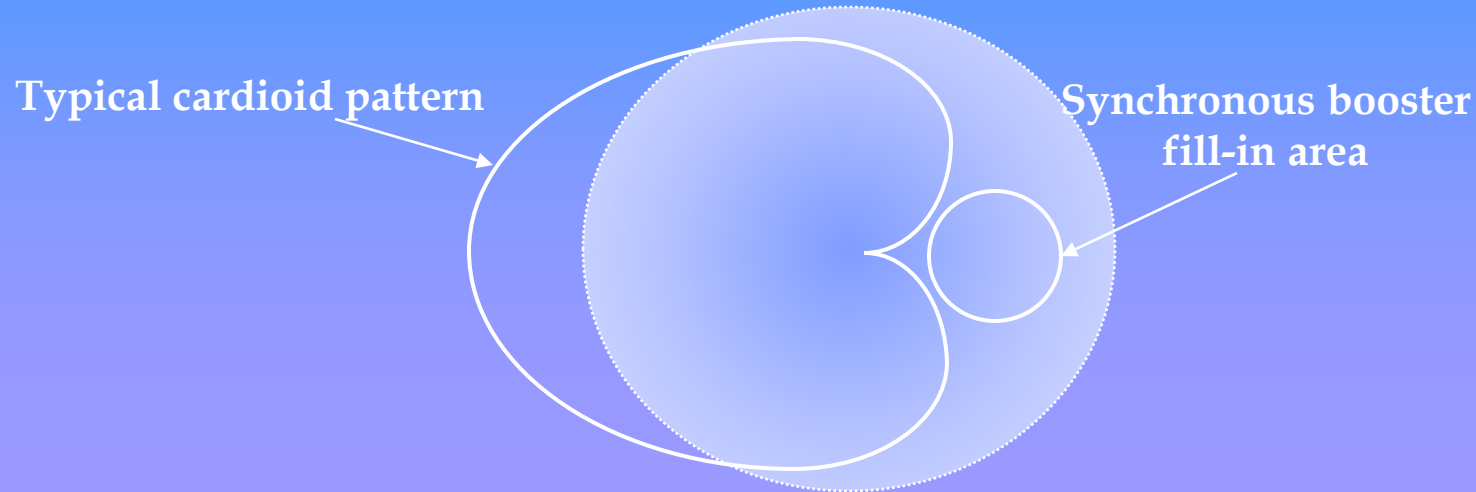


DSP Techniques for Receiver Noise Rejection in Kintronic Labs Receiver Under Development

- Signal delay with look-ahead processing
- Memory storage for signal averaging
- Adaptive limiting & blanking (with delays)
- SSB/VSB processing for adjacent-channel interference (ACI)
- Asymmetric sideband filtering for ACI rejection
- Dynamic front-end AGC & Antenna tuning
- Fast, dynamic spectral measurements (L_{Alt} , L_{Adj} , O_n , U_{Adj} , U_{Alt})
- Dynamic audio noise reduction/expansion
- Fast noise-floor assessment
- CQUAM stereo separation correction
- Program-dependent bandwidth control (tailored for nighttime)
- Synchronous detection for lower distortion & selective fading



Synchronous AM Boosters for Null Fill



- Low-power, low-cost synchronous boosters can provide useful fill-ins for covering populated areas lying in pattern nulls.
- Boosters can be used daytime and/or nighttime as needed.
- Coverage of outlying suburbs can be greatly improved.
- Allocations can generally be handled under existing rules.

What are the Potential Benefits to AM?



- Elimination of co-channel carrier beats and beat-modulated audio intermodulation effects.
- Because AM radio coverage is intrinsically interference-limited, by reducing the co-channel beats we can enlarge the useful coverage area!
- Since the carrier is statistically stationary and ~10-12 dB (3-4 ×) above the average modulation sideband power, a **significant** improvement in listenable coverage area is possible (**and** fewer tune-outs).
- The bottom line: more coverage = more listeners = more revenue!



Existing §73.182 Co-Channel Rules

Class	Channel	Contour (Day) $\mu\text{V}/\text{m}$	Contour (Night) $\mu\text{V}/\text{m}$	Interfer. (Day) $\mu\text{V}/\text{m}$	Interfer. (Night) $\mu\text{V}/\text{m}$
A	Clear	100	500 (50%SW)	5	25
B	Clear Regional	500	2000 (GW)	25	25
C	Local	500	—	25	—
D	Clear Regional	500	—	25	—

Class A stations are protected to the 0.1 mV/m contour (0.5 night); interferers are ≥ 26 dB down.

Class B, C, & D stations are protected to 0.5 mV/m (2.0 for B at night); interferers ≥ 26 dB down.

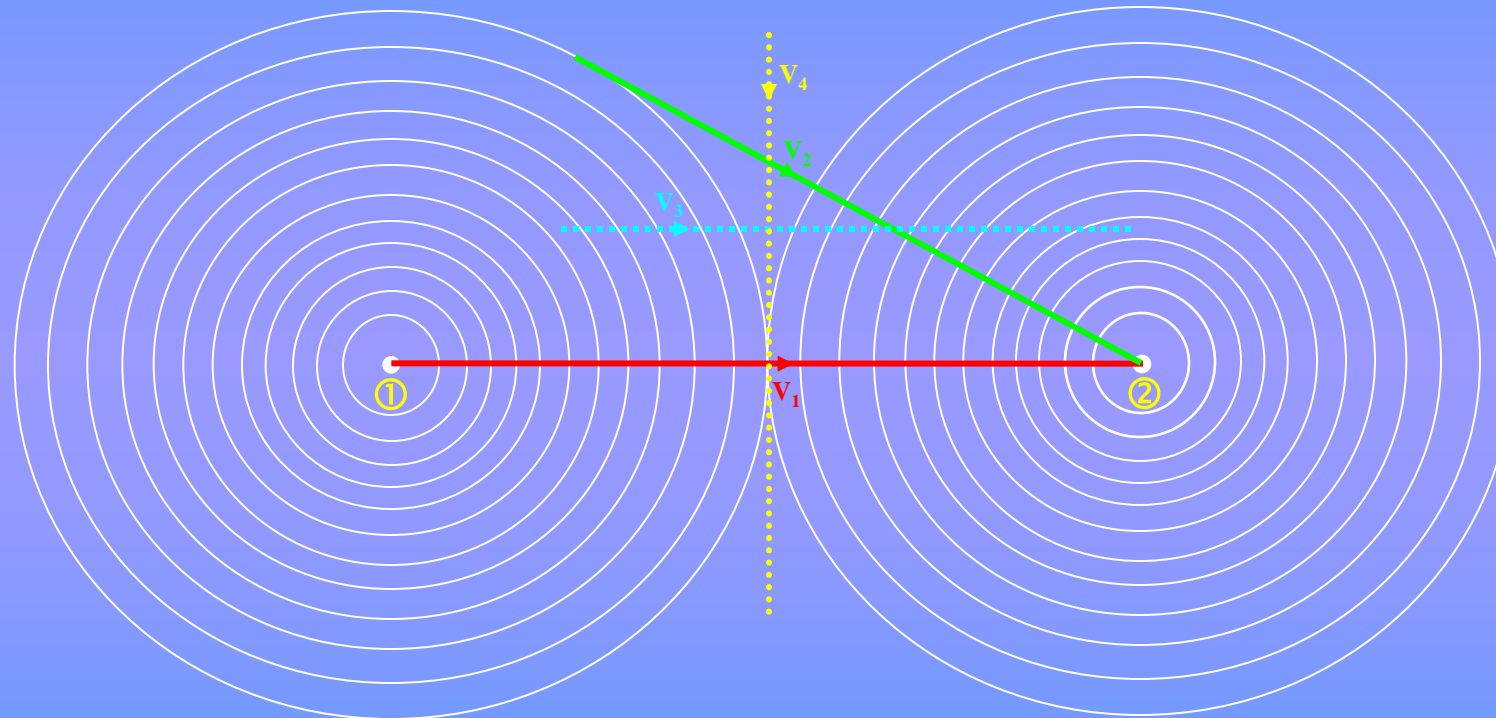
Other advantages of synchronization



- With static beats eliminated, Doppler shifts must be considered in station mild-overlap areas for mobile receivers; due to fast AGCs, not really a problem.
- The technology makes the idea of a synchronous, phase-tracking co-channel low-power AM repeaters feasible for “filling in” poor coverage areas.
- In addition, very wide-area single-frequency network broadcasting with satellite audio distribution is also a possibility.
- AM stations could be used as reference frequencies!
- Receiver AGCs will no longer have to deal with beats.



Field Contours of Overlapping Synchronous AM Transmitters with Typical Mobile-Receiver Trajectories



$$(1) \quad f_{beat}(total) = \sum_n f_{beat}(n)$$

$$(2) \quad f_{beat}(n) = (vR_n \cos \theta_n) (f_0/c)$$

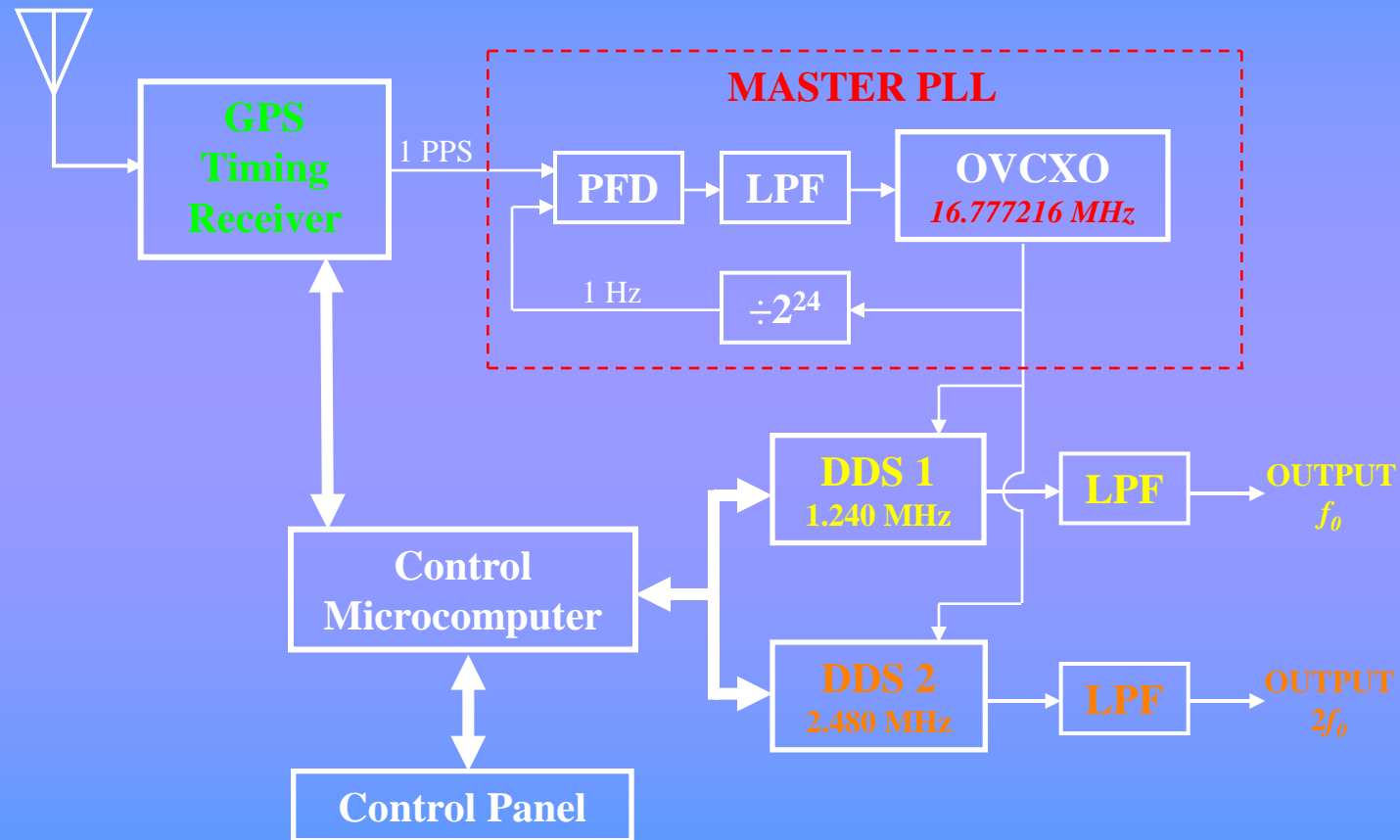
where $f_{beat}(n)$ is the n th beat frequency, vR_n is the velocity relative to station n , θ_n is the angle of the trajectory from the radial from station n , f_0 is the original carrier frequency, n is the number of stations, and c is the speed of light.

Maximum Doppler shifts (on path 1) of about ± 0.1 Hz/MHz at receiver velocity of 30 m/s (67 mph).



AM Synchronizer Unit

Typical Block Diagram



Using 2^{24} Hz as the DDS clock assures that true integer frequencies can be generated!



AM field listening observations

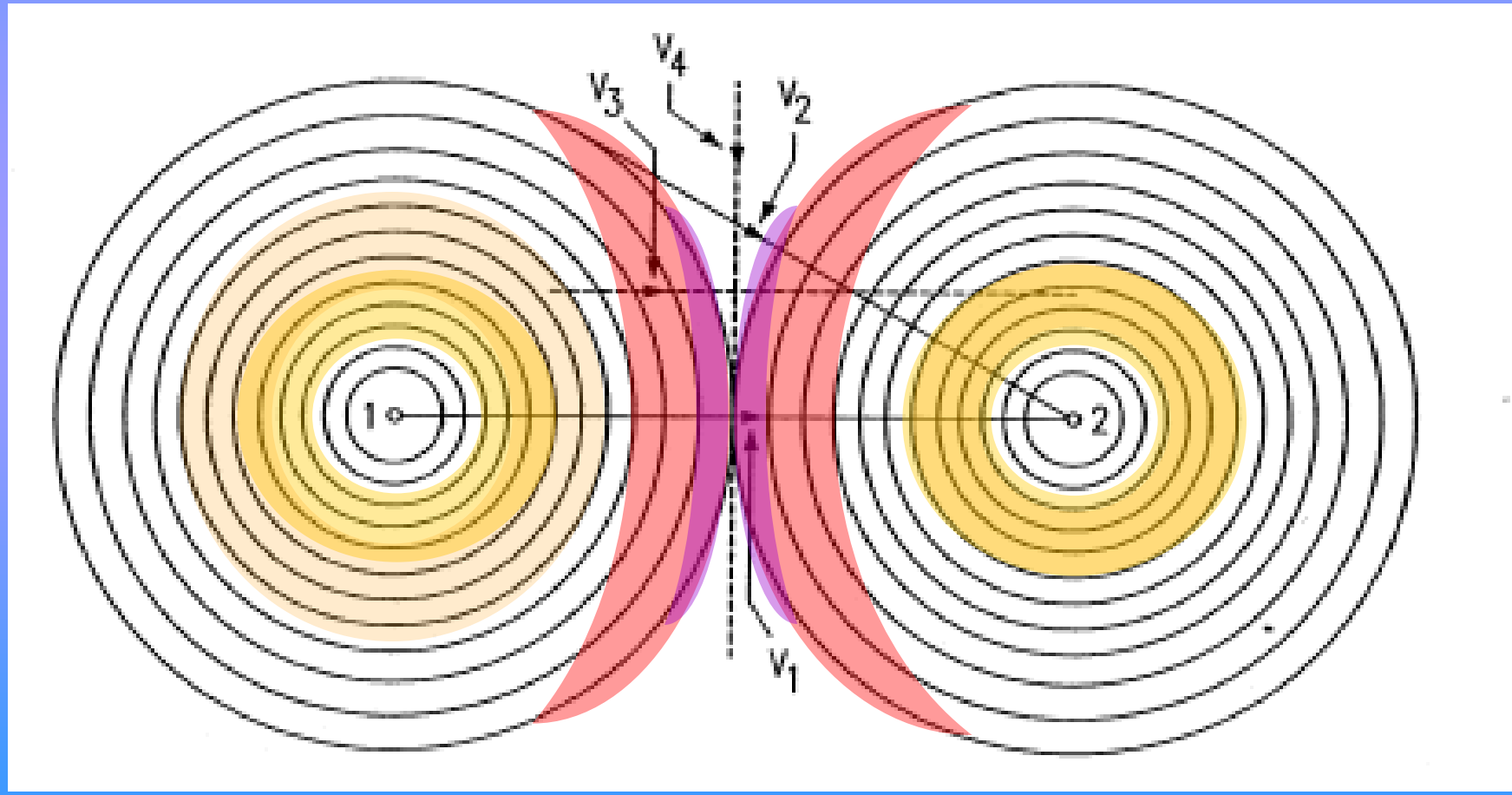
- Carrier beats are the dominant effect — the rates vary from sub-Hertz to about 30 Hz!
- In the worst cases, beat frequencies of ~ 20 Hz cause “Donald-Duck” effects and severe distortion on background audio modulations.
- Beats are much lower in expanded band (1610-1700 kHz) — far fewer stations, newer transmitters!
- Clutter is horrible on local channels; poor coverage!
- Estimated overall typical improvement: 6-10 dB for most stations (talk-oriented).

CD of Lab tests is available – contact us!

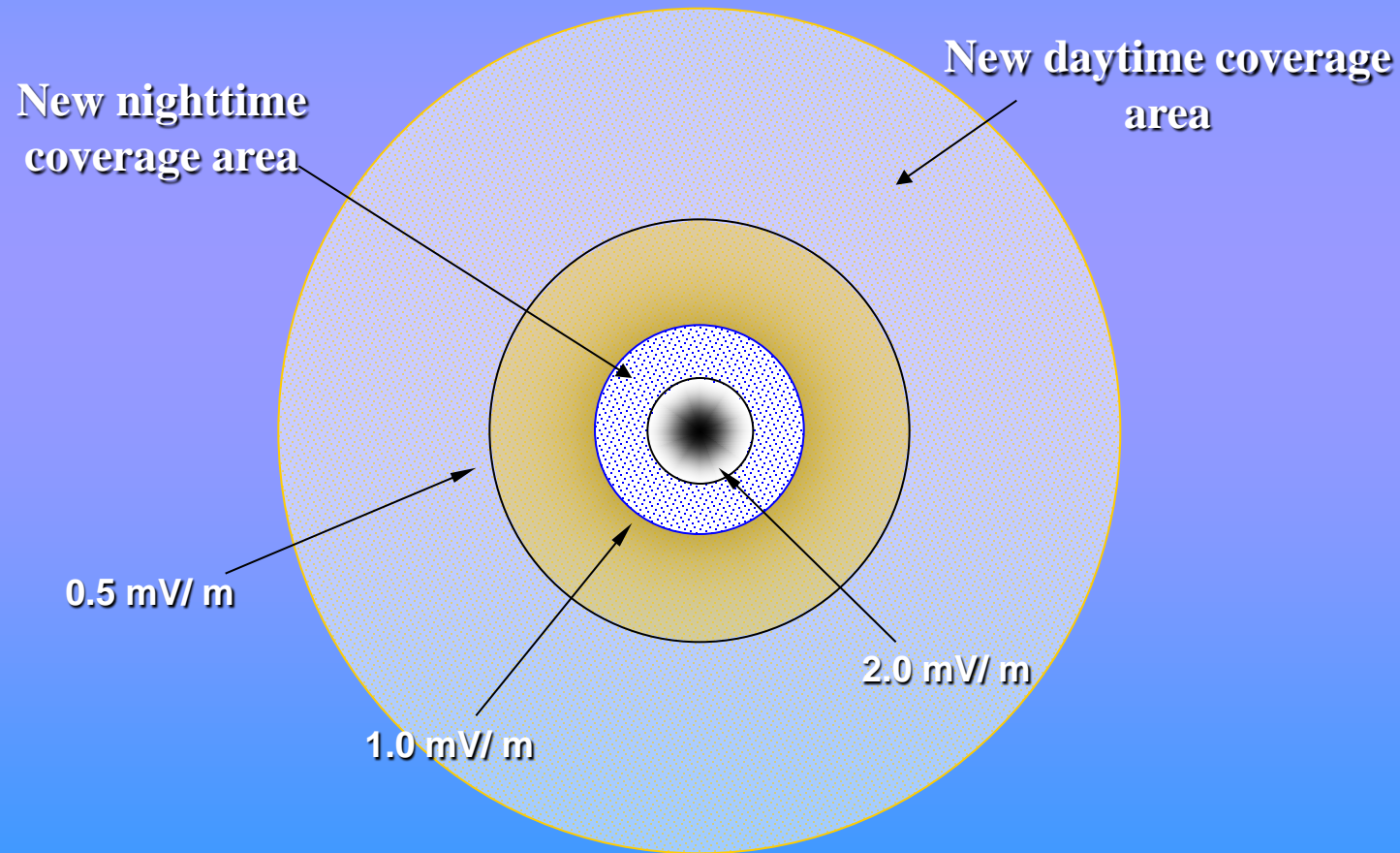


Plot Illustrating Doppler Effects in Mobile Receivers for Synchronous Stations 1 & 2

Original area Enlarged area Interference area (2:1) Int'f. area (Sync'd)



Effective Synchronous Day/Night Interference-Limited Coverage Improvements (Class B)



Pros and Cons



- Typical enlargement of effective coverage area: ~ 6-10 dB (factor of 2 to 3 in radius = 4 to 9 in equivalent listening area).
- Elimination of all static beats, which are the most objectionable effect and the source of most tune-outs. Doppler ≤ 0.2 Hz/MHz at 30 m/s (67 mph).
- Gains greatest for fast music, speech programming.
- Reduction in co-channel beats also benefits HD reception; reduced platform motion for CQUAM AM stereo.
- Masking usually better on wider-band receivers.
- Huge bang for the investment buck for broadcasters!
- Minor or no TX equipment modifications; low cost.
- Concern: all stations need to synchronize or little benefit!



What can be done to fix AM radio?

◆ Broadcasters, NAB, SBE:

- **Adopt synchronous frequency control.**
- **Install CQUAM stereo exciters with GPS-based frequency sync**
- **Report known sources of noise to the FCC website**
- **Work with local congressman and senators to encourage the establishment of new receiver standards**

◆ The Commission:

- **Mandate synchronization (no economic hardship!)**
- **Establish a noise study group under the Future of Unlicensed Services Committee of the Technical Advisory Council**



What can be done to fix AM radio?

◆ Receiver Manufacturers:

- Employ ± 10 -kHz (adaptive) receiver RF/IF bandwidths.
- Include CQUAM stereo decoders.
- Provide 10-kHz notch and selectable/ adaptive IF bandpass filters (± 3 -10 kHz).
- Employ broadband noise/impulse limiters.
- Utilize synchronous detection circuitry.
- Include very tight RF/IF AGC systems.
- DSP-based processing for best cost, flexibility (*e.g.*,
Silicon Labs, NXP, TI, ADI, etc.)

◆ Public:

- Be pro-active in support of high-quality, free AM radio!
- Demand better AM receivers!



The Outlook for AM Broadcasting

(at least, the way we see it!)

- AM, the most spectrally efficient medium, has been essentially technologically orphaned by receiver makers!
- **Beats and co-channel intermodulation** — the source of most tune-outs — can be significantly reduced at low cost using carrier-synchronization technology.
- The 10-kHz audio bandwidth afforded by NRSC specs, along with CQUAM stereo, can provide very acceptable quality vs. FM for music as well as speech programming.
- The industry has done little to deter the generally miserable bandwidth of modern AM radios and has failed to effectively support AM stereo. AM receiver mandates are needed!
- The main needs are for better receiver performance and noise enforcement!