

Burden of Proof Eased For AM Directionals

*By Harry F. Cole
cole@fhlaw.com
703-812-0483*

The FCC has requested comments on a proposal to let some, but not necessarily all, AM directional applicants use “moment method” computer modeling to demonstrate that their directional antennas perform as authorized. The proposal was advanced by a coalition of broadcast engineering mavens – broadcasters, manufacturers, consulting engineers – in early May, following several months of meetings and deliberations. The idea is to reduce the burden, both on AM applicants and on the Commission’s processing staff, by eliminating the need to conduct and analyze field strength measurements of directional arrays in order to verify that they’re working like they’re supposed to.

Historically, the Commission has required directional AM applicants to undertake elaborate, labor-intensive measurements to confirm that their arrays were working properly. Those measurements were then sent to the Commission, where staff members reviewed them as well.

But moment method computer programs (also referred to as NEC, or Numerical Electromagnetics Code, programs) permit the accurate calculation of actual performance based on certain internal antenna parameters, such as current and phase. The coalition also came up with draft rules which would permit the use of moment method modeling to assess the effect of nearby re-radiators on the resulting pattern. Though sponsored primarily by broadcast-oriented firms, this proposal should also speed and simplify the showing required of cellular firms who erect towers within a mile or half mile of an AM station and must therefore demonstrate that their construction is not impacting the AM propagation pattern.

Comments on the coalition’s proposal are due by July 23, 2007; reply comments are due by August 22, 2007.