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Date: Feb. 11, 2021

To: House Federal and State Affairs

From: Allison Mazzei, President of the Kansas Association of Broadcasters

RE: Written Testimony on HCR 5008 – Neutral with Concerns

Good Afternoon Chairman Barker and Members of the Committee,

I'm Allison Mazzei, president of the Kansas Association of Broadcasters. I represent the 260 broadcast stations that are members of the KAB.

I write today to express concern regarding HCR 5008. Broadcasters nation-wide oppose state-by-state time shifts, because adopting different time standards on an individual basis would put each state out of sync with its neighbors, making program scheduling as chaotic as the patchwork time zone map. *Therefore, HCR 5008 is a step in the right direction as it urges congress to adopt permanent daylight savings at a national level. However, without changes from the FCC regarding station sunrise/sunset times, many stations will lose essential hours of broadcast time.*

AM Daytimer Issue

The FCC (which has a good primer on this issue [here](#)) requires the majority of AM radio stations to reduce their power or cease operating at night in order to avoid interference to other AM stations. Currently, the switch to Daylight Saving Time in the spring and summer means an hour less for those stations to broadcast in the morning at those points, but it isn't as consequential because the sunrise is so much earlier. A switch to permanent daylight saving time, however, would significantly cut into fall and winter drive time, as sunrise would be at an even later time than it currently is.

FCC rules governing the daytime and nighttime operation of AM radio stations are a consequence of the laws of physics, dealing with how the relatively long wavelengths of AM radio signals interact with the ionosphere above the earth's surface. Because of how those waves travel at night, they reach much further than during the day, when their signals travel primarily over the surface of the earth – groundwave propagation.

The FCC [establishes](#) the average monthly sunset and sunrise time, based on where a station is located. The times are not consistent across an entire time zone. A large number of AM stations across the country report that they are already unable to go on the air until 7:30 or 7:45 am, the FCC-determined sunrise time, and under a permanent daylight saving time structure, this would become 8:30 or 8:45 – thus missing almost the entirety of prime morning drive time, and finding themselves in a situation where most kids are in school and adults are at work before they would ever get to transmit school closings or weather forecast. Even those who have to wait

until sunrise to increase their power or change directionality would reach much smaller audiences than under current sunrise times. While permanent DST would also delay sunset by an hour, the afternoon and evening drive times are not as critical for AM radio.

Concerns with the FCC

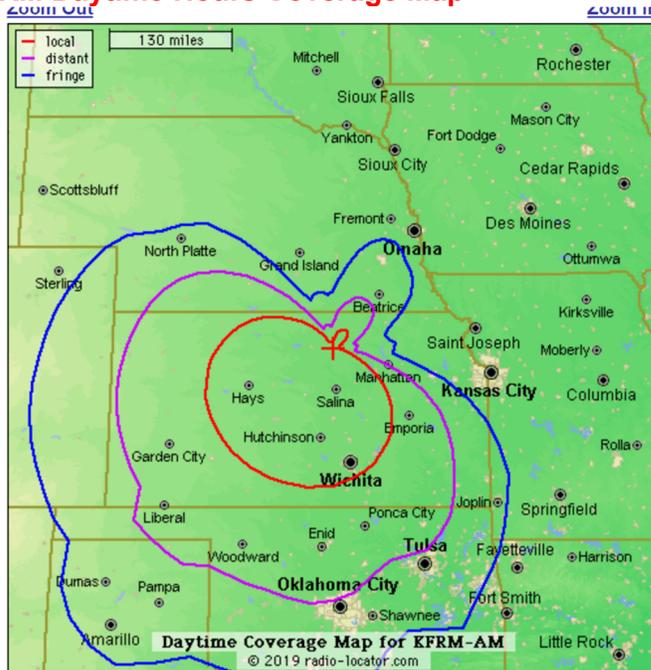
If permanent daylight savings time passed, many broadcasters are doubtful the FCC would make necessary adjustments to sunrise/sunset times based on previous actions. When the Energy Policy Act of 2005 was adopted, Daylight Saving Time was extended to the time frame we have now. Because of the damage that extension in 2007 caused AM stations, the FCC recalculated the “dark” power levels and pre-sunrise power levels for AM stations. Unfortunately, enough things had changed in the AM band that stations were assigned LESS power for FEWER hours when the new calculations came out. There was much uproar and the updated power levels were never put into effect. All this to say, an FCC proposal to solve the missing hour problem would not be new nor likely effective.

The Difference Between Daytime and Nighttime Coverage

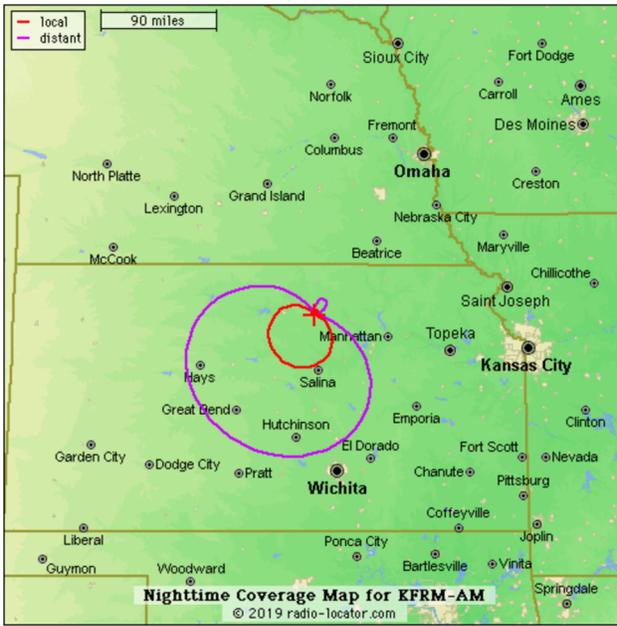
Kansas has 28 AM radio stations that have daytime/nighttime hours, most of which service rural areas of Kansas. These stations play a critical role in serving their community of license, as well as a range of demographic audiences. Most of them are News/Talk stations, and with newspaper availability and coverage declining, these stations are becoming the voice of record for the communities they serve.

Below is one example of how a station’s coverage changes during daytime and nighttime hours. If permanent daylight savings went into effect without changes from the FCC, these communities would miss essential morning hours of coverage.

KFRM Daytime Hours Coverage Map



KFRM Nighttime Coverage Map



The Kansas Association of Broadcasters wants to shed light on this important issue that needs serious consideration before any changes are made at a national level regarding a permanent change to daylight savings time.

I appreciate your time in discussing this important matter. Thank you.