

CATHY McMORRIS RODGERS, WASHINGTON
CHAIR

FRANK PALLONE, JR., NEW JERSEY
RANKING MEMBER

ONE HUNDRED EIGHTEENTH CONGRESS
Congress of the United States
House of Representatives
COMMITTEE ON ENERGY AND COMMERCE
2125 RAYBURN HOUSE OFFICE BUILDING
WASHINGTON, DC 20515-6115
Majority (202) 225-3641
Minority (202) 225-2927

May 21, 2024

Mr. John Bozzella
President and CEO
Alliance for Automotive Innovation
1050 K Street, N.W., Suite 650
Washington, D.C. 20001

Dear Mr. Bozzella:

Thank you for appearing before the Subcommittee on Innovation, Data, and Commerce on April 30, 2024, to testify at the hearing entitled "Preserving Americans' Access to AM Radio."

Pursuant to the Rules of the Committee on Energy and Commerce, the hearing record remains open for ten business days to permit Members to submit additional questions for the record, which are attached. The format of your responses to these questions should be as follows: (1) the name of the Member whose question you are addressing, (2) the complete text of the question you are addressing in bold, and (3) your answer to that question in plain text.

To facilitate the printing of the hearing record, please respond to these questions with a transmittal letter by the close of business on Tuesday, June 4, 2024. Your responses should be mailed to Jessica Herron, Legislative Clerk, Committee on Energy and Commerce, 2125 Rayburn House Office Building, Washington, DC 20515 and e-mailed to Jessica.Herron@mail.house.gov.

Thank you again for your time and effort preparing and delivering testimony before the Subcommittee.

Sincerely,

Gus M. Bilirakis
Chair
Subcommittee on Innovation, Data, and Commerce

cc: Jan Schakowsky, Ranking Member, Subcommittee on Innovation, Data, and Commerce

Attachment

Attachment—Additional Questions for the Record

The Honorable Russ Fulcher

- 1. While more people are receiving emergency information through streaming services in vehicles that don't have access to radio, what can you tell me about the ability of broadband being rolled out to provide reliability of such information absent AM radio? I worry about the timing of the rollout of broadband infrastructure for streaming services for people in cars that would be without an AM radio capability?**

Although we cannot speak to the current state of broadband rollout and its status, we do understand your concerns on ensuring that the public receives critical emergency alerts even in the absence of streaming services.

As we have stated before, cars today contain multiple communication pathways currently included in the Integrated Public Alert and Warning System (IPAWS) network that do not rely on internet such as digital AM/FM radio and satellite radio. Also, roughly 98% of vehicles on the road currently have analog AM radio and 90% of vehicle offerings today still offer analog AM radio. Clearly, there is time to study the most effective ways to provide IPAWS alerts to the public in the future without establishing a mandate that could inhibit the deployment of future innovation and safety technology.

- 2. Does this bill help prevent us coming back to address a future FEMA ask for a completely new communications infrastructure system, in conjunction with the National Weather Service (NWS) for example? This is given the ability of the government to leverage the private sector through the AM radio Primary Entry Points (PEPs) stations and not have to build out a dedicated emergency communications system.**

This bill would not prevent Congress from requesting a new communications infrastructure system from a future FEMA. However, it would make it significantly more difficult to ask FEMA for future changes if more investments continue to be and are solely placed into analog AM radio stations and nothing else within the IPAWS network. FEMA and the FCC have noted the continued decrease in the public's utilization of certain communication platforms, such as analog AM radio. Mandating analog AM Radio and giving it primacy over all other systems, could impede the deployment of future technologies that include electronic sensors that could interfere with the analog AM signal. We believe a technology-neutral approach to the IPAWS network will allow for any current or future technology to integrate into the public alert system that reflects consumer preference and technological change.

Another issue that will present Congress challenges in the future is the new definition for "standard equipment" included in the legislation. This new definition sets a new precedent for a future Congress to mandate any technology in a vehicle it deems "important".

Lastly, IPAWS network overseen by FEMA has said that the public is moving away from radio broadcast. That begs the question, "why are we doubling down on analog AM radio?"

- 3. When I talked to your colleague, Scott Schmidt, Safety Policy for your organization, I pressed him on my skepticism that some auto manufacturers were seeking to get rid of AM radio, claiming they could not get around the technical challenges from “signal interference” that would come through the AM radio. Mr. Schmidt said that from a safety standpoint, the AAI is looking at all the different ways to get alert and other information out through vehicles. Are you all in favor of keeping both the AM radio and exploring the new ways to get this information out? What have you seen the last year from a safety standpoint that tells us “all of the above,” i.e., keeping AM radio as an option remains prudent?**

There is a real technical challenge when it comes to analog AM radio and advanced vehicle systems, especially electric vehicles, due to the high-voltage electrical systems in EVs that generate electromagnetic interference (EMI). According to the Center for Automotive Research (CAR)¹, this interference “distorts AM radio signals... affecting the listening experience for drivers and passengers” making the already interference-susceptible analog AM radio frequency unlistenable. It is possible to some extent to mitigate interference but there is no possible way to eliminate it completely. CAR addressed this and other relevant questions in its October 2023 study, “Analog AM Band Interference in Electric Vehicles, Technical Solutions and the Cost of Mitigating Electromagnetic Interference.”²

Not only is it impossible to completely mitigate EMI when it comes to analog AM radio, but it is also costly. The study found that “mitigating electromagnetic interference (EMI) in an EV is challenging and could lead to added costs for vehicle manufacturers.” CAR estimated that it would cost automakers an estimated \$3.8 billion through 2030 in just materials; understanding that, “the intangible costs of EMI mitigation are substantial.”

We all agree that it is essential for our emergency alert system to continue to be flexible and adaptable to changing dynamics and modern technology. IPAWS was never intended to focus solely on one communication pathway, such as analog AM radio, and instead created a net of pathways to deliver alerts to the public in times of emergency, inside or outside of a vehicle. We support this approach to IPAWS because of how the public consumes information constantly changes.

We also support a technology-neutral approach as it would benefit the public by offering different pathways to receive alerts as well as continue to allow flexibility in the system to continue incorporating new technologies. What concerns us about this legislation is that it heavily places a hand on the scale for analog AM radio with no end date, neglecting the other technologies in a vehicle and in the IPAWS network that FEMA and the FCC have noted are increasingly used by the public versus analog AM radio. Additionally, in a highly competitive multimedia market, this federal legislation would for the first time in our nation’s history give analog AM radio a competitive advantage in a vehicle’s design and real estate as opposed to the other multimedia technology present in a vehicle. Keep in mind, that

¹ The Center for Automotive Research (CAR) is involved in the research of significant issues that relate to the future direction of the global mobility industry. CAR’s mission is to produce independent research, convene stakeholders, and analyze critical issues facing the mobility industry and its impact on the economy and society. CAR subject matter experts provide observations and insights for research clients and Affiliates worldwide. (<https://www.cargroup.org/about/>)

² Center For Automotive Research, Analog AM Band Interference in Electric Vehicles, October 2023, <https://www.cargroup.org/wp-content/uploads/2023/11/AM-Radio-RFI-Technical-Report.pdf>

newer vehicles are highly sophisticated and will require more engineering considerations (which also come with costs) to operate in a manner that reduces harmful interference to analog AM radios. Additional mitigation and engineering will certainly be required in modern vehicles, not to mention future vehicle safety systems and powertrains that rely upon high voltage currents. That said, the requirement to add analog AM radios to all vehicles will create a new paradigm in which auto manufacturers will need to design their vehicles (and all future technologies) around analog AM radios.

As we have pointed out in recent testimony, roughly 98% of vehicles on the road currently have analog AM radio and 90% of vehicle offerings today still offer analog AM radio. Rushing a mandate, when there is time to identify the relevant data and alternate emergency alert pathways, could have unintended consequences in the future unless changes are made to the legislation under consideration.