



June 13, 2008

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington DC 20554

**Re: MM Docket No. 99-325**

Dear Ms. Dortch:

The National Association of Broadcasters (NAB) hereby submits these comments supporting the recent filing of the Joint Parties concerning the digital power level authorized for FM In-Band/On-Channel ("IBOC") digital radio. NAB endorses the Joint Parties' request that the Commission allow broadcasters to increase the power level of digital radio broadcasts by up to 10 dB.

NAB supports the recommendation that the FCC extend the current authorization for IBOC service to permit FM broadcasters to increase their digital power by up to 10 dB from the current level of -20 dB relative to the analog signal. This would allow FM broadcasters to increase their digital power from -20 dB to -10 dB relative to the analog signal. NAB also supports the recommendation that the Commission establish this increase in FM power on a blanket basis for all FM digital stations rather than requiring broadcasters to seek a separate authorization. NAB recognizes that the proposed increase in power for FM IBOC broadcasts may create new instances of interference in certain situations, and notes that the recommendations made for authorization of this service include Commission action to address instances of unexpected levels of interference on a case-by-case basis. NAB believes that the benefits to be gained for FM broadcasters and FM listeners will far outweigh the limited additional interference predicted by iBiquity's studies.

In its analysis of the iBiquity test program, NAB reviewed the following material:

- 1) A report from iBiquity documenting station coverage at existing and higher power levels;
- 2) A report from Salisbury University presenting the results of the consumer test of digital/analog compatibility;
- 3) A report from CBS Radio detailing building penetration at existing and higher power levels.

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NAB retained Hammett & Edison, Inc. as consulting engineers to conduct an independent assessment of the reports presented to NAB. Hammett & Edison conducted a detailed analytical study of the test reports and verified both the methodology used in the tests and the validity of the report's conclusions.

As the Joint Parties discuss in their filing and is explained in detail in the iBiquity reports, in all the test scenarios, the higher digital power resulted in significant improvements in digital coverage. This translated into digital coverage extending farther from the transmitter as well as fewer drop outs of the digital signal in core coverage areas. These improvements were seen in all conditions, and some stations experienced more than 30% improvement in coverage due to the higher digital power level. The building penetration tests also demonstrated significant performance improvement from an increase in digital power. The higher digital power level supported building penetration equal to or exceeding analog performance.

The compatibility test program produced equally positive results. In the vast majority of test scenarios the increase in digital power did not create a significant risk of harmful interference to analog broadcasts. Testing inside the protected contour of stations highlighted only one area of potential concern: severely short spaced Class B stations. In a narrow band directly between the two signals there may be an increased risk of interference from the digital signal. Because the test program involved some of the more severe examples of short spacing, however, NAB believes this will not be a problem in the vast majority of cases. In those cases where there are limited instances of interference, the Commission's existing rules will provide the Commission with the necessary authority to address any interference concerns. Outside the protected contour, Super B stations operating at the higher digital power level were shown to have the potential to impact first adjacent Class B stations. NAB supports the Joint Parties' recommendation for limits on the digital power for Super B stations to avoid any of the potential interference highlighted in the test program.

The proposed power increase has the potential to greatly enhance the rollout of HD Radio technology and to increase the value of the digital system, particularly for operators of Class A and LPFM stations. In many cases, those stations operate at analog power levels that cannot support a digital broadcast at 1% of analog power, as is required under existing rules. That digital signal falls below the ambient noise floor in the FM band. Authorizing these stations to increase digital power levels to 10% of the analog power level will allow these stations to maintain a viable digital service without creating harmful interference to adjacent channel stations.

For these reasons, NAB encourages the Commission to expeditiously authorize FM broadcasters to increase their digital power level by up to 10 dB consistent with the parameters outlined in the Joint Parties' submission. This will facilitate the ongoing

rollout of the HD Radio system by allowing digital broadcasts to more closely match existing analog coverage and by facilitating the introduction of new portable HD Radio devices.

Respectfully submitted,

A handwritten signature in black ink that reads "Marsha J. MacBride". The signature is written in a cursive, flowing style.

Marsha J. MacBride  
Executive Vice President  
Legal and Regulatory Affairs