

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Petition for Rulemaking of GeoBroadcast Solutions, LLC)	RM 11854
)	
Amendment of Section 74.123(i) of the Commission’s Rules on FM Broadcast Booster Stations)	

COMMENTS OF XPERI CORPORATION

Xperi Corporation (“Xperi”), the developer and licensor of HD Radio™ technology, submits these comments in response to the Public Notice issued by the Federal Communications Commission (“FCC” or “Commission”) with respect to the Petition for Rulemaking (the “Petition”) filed by GeoBroadcast Solutions, LLC (“GeoBroadcast”) seeking to amend FM booster rules to facilitate zoned broadcast coverage, or ZoneCasting.¹ Xperi fully supports the Commission’s exploration of new opportunities for broadcasters and data services and the rollout of smart, user-friendly broadcast technology, and it commends GeoBroadcast for raising the prospect of ZoneCasting with the agency. While the Petition shows some promise, it leaves questions unanswered about operational parameters in a hybrid digital environment and the overall potential for listener disruption. The increasing penetration of digital radio products and the growing listenership to digital services warrants the need to address the questions of compatibility with digital broadcasts. Accordingly, Xperi encourages the FCC to gather more specific information on how ZoneCasting will impact the user experience before proceeding to a Notice of Proposed Rulemaking.

¹ FCC Consumer & Governmental Affairs Bureau, Report No. 3145, Public Notice (Apr. 2, 2020); GeoBroadcast Solutions, LLC, *Amendment of Section 74.1231(i) of the Commission’s Rules on FM Broadcast Booster Stations*, Petition for Rulemaking, RM No. 11854 (rec. Mar. 13, 2020) (“Petition”).

Improved study and listener feedback on the ZoneCasting experience will help the Commission weigh whether any downgrade in service warrants moving forward with the Petition. The Commission readily accepts in the *All-Digital AM Broadcasting NPRM* that “interference and reception issues” have caused “a steady decline in listenership” for radio broadcasters.² The same NPRM touts the likely listener benefits of “clearer audio quality” and “a more reliable signal,” acknowledging that a “pristine signal” will avoid “deter[ring] listeners.”³ Here, the Petition acknowledges the potential for user disruption caused by a transition area between a primary station and booster coverage zones. However, its conclusion that “it is believed consumer tune-out would be unlikely” is merely theoretical.⁴ More actual user feedback is necessary to corroborate that “self-interference experienced by listeners . . . limited to only a few city blocks, for a very limited period of time” would not cause more harm to the listener experience than the Petition speculates. Given that more than half of all radio listening is done in cars, the potential for listener dissatisfaction is not insignificant.⁵

For these reasons, the Commission should seek more information for how the ZoneCasting technology intends to manage the transition between hyper-local analog content and the regional digital content of an HD1 signal. One of the key requirements of the HD Radio system is the simulcasting of the analog service on the HD1 digital channel, meaning that radios are designed to blend between analog and HD1 digital audio during initial tuning or under weak signal conditions. The user experience is dependent on identical content and time alignment between these two services. Moreover, more than 65 million cars are equipped with HD Radio,

² *All-Digital AM Broadcasting*, Notice of Proposed Rulemaking, 34 FCC Rcd 11560, para. 2 (2019).

³ *Id.*, para. 8.

⁴ Petition, Goldman Declaration, at 6.

⁵ Petition, at 12 n.23.

representing more than 35% of the vehicles on the road in major markets like New York City, Los Angeles, Detroit, and Miami. Transitioning between zones where digital content differs from analog content will cause further disruption to the user listening experience and will increase confusion about proper operation of receivers. Furthermore, if ZoneCasting can potentially operate in a hybrid mode (analog plus digital transmission), additional testing and evaluation of the digital performance in this single-frequency network configuration would be necessary to properly tune operational parameters for the localized transmission. At bottom, the Commission must gather more information and test results on the extent to which ZoneCasting can minimize listener disruption for stations transmitting a digital signal.

Xperi also encourages the FCC to explore the need for stations utilizing ZoneCasting to provide some form of on-air notifications or advisories to their listeners regarding the potential disruption that may occur as a listener moves through the station's different zones. Assuming ZoneCasting causes some disruption to listeners, these listeners most likely will complain to radio manufacturers (or automobile manufacturers) who will lack requisite information about local broadcast operations to appropriately resolve these issues. Xperi believes that appropriate disclosure requirements encouraging resolution of listener complaints by those stations utilizing ZoneCasting would best serve listeners.

Respectfully submitted,

XPERI CORPORATION

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CERTIFICATE OF SERVICE

I, Kim Riddick, hereby certify that on this 4th day of May, 2020, I caused a true and correct copy of the foregoing to be served by e-mail and U.S. mail on:

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