

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In Re:)	
)	
Petition for Rulemaking)	RM-11836
To Allow the MA3 All-Digital Mode)	
Of HD Radio for AM stations)	

COMMENTS OF HUBBARD RADIO, LLC

Hubbard Radio, LLC (“Hubbard”), parent company of Washington DC FCC License Sub, LLC, licensee of WWFD(AM), Frederick, Maryland (“WWFD”), pursuant to Section 1.405 of the rules of the Federal Communications Commission (“FCC” or “Commission”), 47 C.F.R. § 1.405, hereby files these comments in support of the Petition for Rulemaking filed by Bryan Broadcasting Corporation (“Bryan Petition”).¹ The Bryan Petition requests that the Commission initiate a rulemaking proceeding to consider permitting AM licensees to have the option to go all-digital using the MA3 mode, the primary AM all-digital service mode.² Hubbard agrees that initiating such a rulemaking proceeding is in the public

¹ See Consumer & Governmental Bureau Reference Information Center Petitions for Rulemaking Filed, Report No. 3123 (April 11, 2019).

² See Bryan Petition at 1.

interest. Additionally, it would be consistent with other efforts the Commission has taken to revitalize AM radio.

Since July 2018, Hubbard has been operating WWFD pursuant to an experimental license to broadcast in all-digital using the MA3 mode.³ Since that time, Hubbard has noticed significant improvement to WWFD's audio quality.⁴ In addition, as a result of the new transmission technology, Hubbard has a newfound ability to transmit metadata to accompany the audio, such as title, artist, and album fields, as well as data services such as album artwork images.⁵

Hubbard believes that transmitting in MA3 mode helps AM broadcasters achieve aural and visual parity with other services found in vehicle entertainment systems (e.g. FM HD, streaming services, satellite radio). The MA3 signal has proven to be much more robust than the hybrid (MA1) mode of HD AM broadcasting that has been used previously. Feedback has been positive for WWFD, as listeners (including some who may not have been aware that their

³ See Letter from Jerome J. Manarchuck, Audio Division, Media Bureau, to Kenneth E. Satten, counsel to Washington DC FCC License Sub, LLC, licensee of WWFD(AM), File No. 20180628AA1 (July 6, 2018).

⁴ See also Comments of Durand Broadcasting, LLC, RM-11836 (filed Apr. 27, 2019) ("I have been following the full digital test from WWFD in Washington DC and have been impressed not only with its sound, but also that it is not interfering with adjacent channels like the digital hybrid mode has caused.").

⁵ See also Comments of Xperi Corporation at 3, RM-11836 (filed May 6, 2019) ("The MA3 service mode greatly expands the capability of AM broadcasters to offer better quality audio and new data services through a robust transmission service.").

receivers were HD-capable) have contacted the station with positive impressions of the fidelity and robustness of WWFD's signal.

Hubbard's experience with WWFD has resulted in the company considering transitioning additional AM stations to all-digital broadcasting, once Hubbard is permitted to do so. Hubbard believes that an approach as described in the Bryan Petition is a sound method to allow broadcasters to voluntarily transition to MA3 in order to better serve their listeners, based on stations' individual circumstances within their markets. Hubbard supports initiating a rulemaking proceeding to consider whether all AM licensees should have the option to go all-digital using the MA3 mode.

Respectfully submitted,

/s/ David Jones

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