

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

In the Matter of)	
)	
Amendment of Part 74 of the Commission's)	MB Docket No. 18-119
Rules Regarding FM Translator Interference)	
)	

COMMENTS OF XPERI CORPORATION

Xperi Corporation (“Xperi”), the developer and licensor of HD Radio technology,¹ submits these comments pursuant to Section 1.415 of the Commission’s Rules, in response to the FCC’s Notice of Proposed Rulemaking in the above-referenced matter (the “NPRM”).² Xperi commends the Commission for recognizing the need to address the cumbersome and often confusing translator complaint resolution process. At the same time, Xperi encourages the Commission to carefully consider the effect of any changes to the complaint resolution process—and, in particular, the outer contour limit for affected stations—on the adoption and use of HD Radio technology.

I. BACKGROUND.

A. About HD Radio.

HD Radio technology utilizes digital modulation techniques which provide radio stations the ability to transmit many types of content: audio, text, images, traffic messages, and generic data applications. HD Radio broadcasting provides many benefits over traditional analog radio,

¹ In 2015, DTS Inc. acquired iBiquity Digital Corporation, the original developer and licensor of HD Radio technology. In 2016, Xperi acquired DTS Inc., which continues to operate as a wholly-owned subsidiary of Xperi.

² See *Amendment of Part 74 of the Commission’s Rules Regarding FM Translator Interference*, Notice of Proposed Rulemaking, MB Docket No. 18-119 (rel. May 10, 2018).

including crystal clear, static free sound, multicasting, enhanced metadata (including artist, song title, and album information), traffic services, and enhanced digital emergency alerts.

To date, HD Radio technology has been successfully deployed across 2,300 radio stations in the United States covering all of the top 100 Nielsen Metros and more than 90% of the U.S. population. Furthermore, there are currently 335 stations in 87 markets transmitting digital emergency alert notifications and utilizing HD Radio's enhanced public safety capabilities.

Consumer adoption of HD Radio continues to expand at a rapid pace. There are now more than 50 million HD Radio-equipped cars on the road – a number that is growing every day. All major auto brands offer factory-installed HD Radio technology, with HD Radio technology as standard on over 150 vehicle models.

B. HD Radio's Interest in This Proceeding.

FM translators are an important part of the HD Radio story. HD Radio technology allows broadcasters to bring more programming choices to their listeners by offering up to three supplemental program services in addition to their main program service. Many broadcasters expand the reach of these additional audio channels by simulcasting them on FM translators.

At the same time, HD Radio technology offers the opportunity for innovative data services that depend on interference-free operations, such as connected car, smart city, and public safety applications. Reliable digital emergency alerts with multi-lingual audio, text, and image services and other smart data applications will require appropriate protection on digital radio services to maximize population coverage. Accordingly, Xperi appreciates the careful balance that the Commission must strike between protecting actual services offered by primary stations while, at the same time, not unnecessarily precluding the use of FM translators.

II. THE COMMISSION SHOULD ACCOUNT FOR THE BENEFITS OF HD RADIO WHEN BALANCING THE PROMOTION OF FM TRANSLATORS AGAINST THE NEED TO PROTECT PRIMARY STATIONS.

The substantive component of the NPRM seeks comment on the signal strength beyond which an FM station may not claim interference to its listeners from an FM translator.³ In particular, the FCC proposes to restrict translator complaints to listener interference that occurs within a primary station's 54 dBu contour.⁴ Xperi continues to evaluate the Commission's proposal and its effect on HD Radio.

Nevertheless, Xperi strongly encourages the Commission, in determining the proper interference threshold, to consider not only current uses of FM broadcast spectrum, but also future uses that could support new and innovative digital services, such as connected cars, smart cities, emergency alerts and other public service applications. Use of the HD Radio system for these new services will require a deliberate and thoughtful analysis of digital radio protection requirements to ensure these future services remain viable. Accordingly, as the Commission evaluates suggestions for translator protections in this proceeding, we ask that the agency carefully consider the potential impact of such protections on the future expansion of digital broadcasting services so that new and innovative uses of the HD Radio technology are not foreclosed prematurely.

III. CONCLUSION

Xperi appreciates this opportunity to share its input on the NPRM and looks forward to working with the Commission to ensure that any changes to the rules governing FM translator interference provide for the continued growth and development of HD Radio.

³ NPRM ¶ 23.

⁴ *Id.* ¶ 27.

Respectfully submitted,

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August 3, 2018