

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

In the Matter of)	
)	
Proposals for a New FM Radio Broadcast)	MB Docket No. 18-184
Class C4 and to Modify the Requirements)	
for Designating Short-Spaced Assignments)	

COMMENTS OF XPERI CORPORATION

Xperi Corporation (“Xperi”) is pleased to submit these Comments in response to the above-referenced Notice of Inquiry (the “NOI”).¹ Xperi is dedicated to creating innovative technology solutions that enable extraordinary experiences for people around the world. Among other innovative technologies and inventions, Xperi is the developer and licensor of HD Radio technology.² HD Radio now covers more than 90% of the U.S. population, and has been successfully deployed across 2,300 radio stations.

The NOI asks for comment on a proposed amendment to the Commission’s rules that would create a new Zone II FM station class – “Class C4.” When considering similar proposals in the past, the Commission has “weighed any demonstrated need for additional outlets or improved service against the effects such changes would have on the present FM service.”³ Xperi commends the Commission for this approach, and urges it to carefully consider the effect that establishing a new class of FM radio stations would have on the adoption and use of HD Radio technology.

¹ See *In re Proposals for a New FM Radio Broadcast Class C4 and to Modify the Requirements for Designating Short-Spaced Assignments*, Notice of Inquiry, MB Docket No. 18-184 (rel. June 5, 2018).

² 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.

³ NOI ¶ 11.

I. BACKGROUND

A. About HD Radio

Through digital modulation techniques, HD Radio technology gives radio stations the ability to transmit many types of content, including audio, text, images, traffic messages, and generic data applications. HD Radio broadcasting provides numerous benefits over traditional analog radio, including crystal clear, static free sound; multicasting; enhanced metadata (e.g., 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. These stations cover all top 100 Nielsen Metros and more than 90% of the U.S. population. In addition, 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

Xperi's interest in this proceeding stems from its appreciation of the careful balancing the Commission must do to protect incumbent users of the FM band (including new technologies developed by or for those users) while also optimizing the spectrum the band occupies.

Therefore, Xperi is pleased that the NOI asks for input on the effect the proposed Class C4 stations would have on interference and the operation of secondary services like FM translators.

HD Radio technology depends on interference-free operations to provide innovative data services like connected car, smart city, and public safety applications including digital emergency alerting services. Thus, Xperi is cognizant of the increase to the "noise floor" that an

additional class of FM station could produce. Given the maturity of the FM service, the Commission must balance the benefits to FM service coverage that an increased density of signals could provide against the potential to degrade reception for stations in areas where there is currently a listenable signal.⁴

In addition, and consistent with its mandate to foster a “fair, efficient, and equitable distribution of radio service,” the Commission must weigh the proposal to create a new class of FM stations against existing uses of the spectrum. Xperi is particularly concerned about FM translators, which 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 their additional audio channels by simulcasting them on FM translators.

II. THE COMMISSION SHOULD ACCOUNT FOR THE BENEFITS OF HD RADIO WHEN CONSIDERING WHETHER TO ESTABLISH A NEW CLASS OF FM STATION

In addition to interference considerations and FM translators generally, Xperi strongly encourages the Commission to consider HD Radio specifically when evaluating the Class C4 proposal. HD Radio technology not only makes radio sound better, it also supports new and innovative digital services like connected cars, smart cities, emergency alerts and other public service applications. Use of the HD Radio system for these new services requires a deliberate and thoughtful analysis of digital radio protection requirements to ensure these services remain viable. Accordingly, as the Commission evaluates the Class C4 proposal, we ask that the agency carefully consider its potential impact on digital broadcasting services so that new and innovative uses of HD Radio technology are not foreclosed prematurely.

⁴ *Id.* ¶ 15.

III. CONCLUSION

Xperi appreciates this opportunity to share its input on the NOI and looks forward to working with the Commission to ensure that any rule changes allow for the continued growth and development of HD Radio.

Respectfully submitted,

XPERI CORPORATION

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