

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
)
Revitalization of the AM Radio Service) MB Docket No. 13-249

COMMENTS OF DTS, INC.

DTS, Inc. (“DTS”) hereby submits these comments in response to the Commission’s recent Further Notice of Proposed Rulemaking (“FNPRM”) and Notice of Inquiry (“NOI”) in the above-referenced proceeding.¹ DTS is generally supportive of the changes to its rules that the Commission adopted in the First Report and Order and that are intended to provide greater flexibility for and regulatory relief to AM broadcasters. There remains an important public interest in maintaining AM broadcasting, and the Commission’s focus on AM broadcasting is noteworthy. With regard to the FNPRM and the NOI, DTS urges the Commission to use this proceeding to encourage the further rollout of digital AM service and to ensure that any additional changes the Commission makes to its AM rules take into account their potential impact on digital service.

In October 2015, DTS acquired iBiquity Digital Corporation, the developer of HD Radio™ technology for digital AM and FM broadcasting. DTS has a long history of providing high quality, immersive and engaging audio experiences to listeners of mobile devices, home theater systems, and cinema and has now added the HD Radio system to its portfolio of audio solutions. DTS technology is integrated into more than two billion devices globally and is used to provide premium audio solutions to enhance entertainment experiences. Through its acquisition of

¹ *Revitalization of the AM Radio Service*, MM Docket No. 13-249, *First Report and Order, Further Notice of Proposed Rule Making and Notice of Inquiry* (Oct. 23, 2015)(“FNPRM”).

iBiquity, DTS has provided even greater resources and commitment to the HD Radio system to ensure the expansion of digital broadcasting services throughout North America.

1. DTS Endorses Proposals to Enhance Use of the Expanded Band

DTS supports the Commission's proposal in the NOI to make greater use of the expanded band. The expanded band offers a lower interference environment that could help address many listener complaints about AM broadcasting. It also provides a unique opportunity for the Commission to allow broadcasters to introduce all-digital broadcasts that would help eliminate much of the interference that plagues the AM band. In addition to increases in the noise floor that have occurred in recent years, AM broadcasters have long contended with interference from co- and adjacent channel stations. The AM all-digital system was designed to help reduce that problem.

As has been well established in the Commission's record, the AM HD Radio system affords broadcasters the ability to offer FM quality sound that can support robust music formats in the AM band. Higher quality audio allows AM broadcasters to attract listeners that have turned to other sources of audio entertainment due to the limitations of analog AM. All major automobile manufacturers in the United States offer HD Radio receivers in their vehicles, and a significant percentage of vehicles on the road include digital receivers, making all-digital broadcasts economically feasible. In addition to the audio quality enhancements that can be achieved today with hybrid mode AM broadcasts, all-digital broadcasting can offer benefits that are not as easily provided using the hybrid mode. The main constraints confronting AM broadcasters using the hybrid mode of the HD Radio system are interference from analog broadcasts to the digital signal and the need to constrain digital operations in order to protect existing analog operations. The all-digital AM system eliminates these problems. As the Commission is aware, the all-digital AM

HD Radio system moves the digital energy to the center of the AM channel, thereby reducing overlap between adjacent channel AM signals and reducing the adjacent channel interference that limits AM station coverage. The absence of an analog signal eliminates host analog interference to the digital signal, thereby extending the range of AM digital broadcasts.

In the NOI, the Commission notes there is a need to better define the technical standards for all-digital service. DTS is prepared to work with the Commission and the broadcast industry to develop the technical rules necessary to guide the introduction of all-digital service and believes a Notice of Proposed Rulemaking on AM all-digital service would provide the appropriate vehicle for the input of that information into the Commission. DTS encourages the Commission to use this proceeding to advance the use of the all-digital system in the expanded band.

In the alternative, if there Commission determines there is not sufficient support in the industry to use all-digital broadcasts at this time, the Commission should require that any new stations introduced in the expanded band include hybrid digital broadcasts in their initial offerings. It would be illogical to introduce new AM broadcasts that cannot offer the highest quality audio experience for listeners and that would require additional upgrades in the future in order to provide digital service. Requiring digital service from the beginning will help the Commission to ensure the longer term viability and relevance of any new stations introduced in the expanded bands.

2. The Commission Should Ensure Any Changes to the AM Technical Rules Do Not Negatively Impact the Rollout of HD Radio Broadcasting

The FNPRM proposes a number of changes to the Commission's technical rules for the AM service. Before implementing any of these changes, the Commission should consider the impact of those changes on existing digital service and the future introduction of digital service on additional stations. For example, the Commission's proposal to change the nighttime protection for Class A AM stations and daytime protection to Class B, C and D stations has the potential to

impact digital operations. Eliminating the existing nighttime protections would eliminate the need for digital stations to provide protection for Class A stations, however, the introduction of additional AM stations or the increase in local nighttime broadcasts by existing stations has the potential to increase nighttime interference that would negatively impact digital operations. Similarly, although the daytime protection ratio for Class B, C and D stations existed prior to 1991, the Commission's experience with those protection ratios predates the introduction of digital service. DTS is concerned that increases in analog power could increase interference levels and thereby decrease digital service. DTS intends to monitor the comments on these topics and, if required, will provide future input to the Commission on the potential impact on digital service of specific proposals from commenters.

Conclusion

DTS endorses the Commission's efforts to work with broadcasters to ensure the long term viability of AM broadcasting. DTS looks forward to the comments on the Commission's proposals in the FNPRM and NOI and respectfully requests that the Commission consider the DT' comments in its ongoing work in this proceeding.

Respectfully submitted,

/s/ _____

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