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December 22, 1998

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

Re: RM-9395: In The Matter of Amendment of Part
73 of the Commission's Rules to Permit the
Interdiction of Digital Audio Broadcasting in the AM
and FM Broadcast Service

Dear Ms. Salas:

Susquehanna Radio Corp., (Susquehanna), licensee of 7 AM and 16 FM radio stations offers these comments in support of the USA Digital Radio petition for rulemaking concerning the introduction of an in-band on-channel digital broadcasting (IBOC) in the AM and FM bands.

Susquehanna, a broadcast station licensee for more than 56 years, recognizes the need to convert our system of AM and FM broadcasting from analog to digital. We are in the Digital Age and all other forms of communication are in the process of being transformed to this high quality and reliable form of information transmission. Telephone transmission, wireless communications and more recently television broadcasting are all taking advantage of the superb performance of digital transmission. Radio broadcasting, the first and most widely used medium for reaching mass audiences, must move forward with its conversion to digital transmission, or become an outdated technology in a modern world of communication.

The USADR Petition for Rulemaking is an extremely complex and an all encompassing proposal. Susquehanna has followed the development of the USADR and other proposed IBOC transmission systems since their inception and we firmly believe that IBOC provides a spectrum efficient approach for the transmission to Digital Audio Broadcasting that is in the best interest of both the broadcasters and the public.

Susquehanna supports the overall concept of IBOC as proposed in the Petition for Rulemaking and would like to offer comments on four specific points of that proposal.

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Subsidiary of Susquehanna Pfaltzgraff Co.

The Commission should institute rulemaking that would adopt IBOC as the standard for digital broadcasting in the United States.

The fact that the technical quality and robustness of digital transmission is far superior to that of analog is undisputed. There is no reason for Radio Broadcasting to remain in the analog domain. The public interest would be best served by adopting IBOC as the preferred method for the transmission of Radio Broadcasting to digital transmission for the following reasons:

In-band on-channel digital audio broadcasting needs no new spectrum. The development of a DAB system that can co-exist and operate within the existing spectrum of existing AM and FM stations is certainly in the public interest. Spectrum efficiency can and should be a major factor in developing any new technology or refining any existing services.

In-band on-channel requires no new allocation system. Unlike any other potential DAB broadcast service, the frequency and geographic allocations for an IBOC system are already in place. Although the allocations for both the AM and FM bands were developed over many years and, in certain cases, may not be optimum, each of the stations in these services was allocated in a manner that was determined, by the Commission, to serve the public interest. This market-driven distribution of facilities provides service to the entire country in a manner that is in general proportion to population density. The time consuming and painstaking process of developing an allocation scheme that is generally associated with any new service will simply be unnecessary with IBOC.

In-band on-channel DAB systems utilize the existing transmission facilities of AM and FM stations and require no new transmitting sites. The cost of implementation by the broadcaster will be minimal when compared to the cost of acquiring new transmitting sites and erecting new towers for any new band system. In the conversion to Digital Television, there is a great deal of concern, by both the FAA and those involved with the preservation of the environment, over the construction of new towers. The public interest will clearly be best served by the development of an in-band on-channel (IBOC) DAB system that requires no new towers or major infrastructure for broadcast transmission facilities.

In band on channel has a built-in programming advantage. IBOC has the unique capability of immediately bringing high quality radio programming with a wide variety of formats to the new digital receivers. Unlike most new services, IBOC, with the built in programming of its host analog station, will be able to provide time proven programming on the first day the new facility is placed in service.

The public interest will best be served by developing a DAB system that will be compatible with existing systems and provide new AM/FM/DAB receivers at the lowest possible cost. All digital receivers will require new digital chips for conversion, coding, and compression. An in-band on-channel system will simply be an extension of the present AM-FM receiver which should require no additional antenna or complex RF section. There should be no question that in-band on-channel receivers can be designed, built, and marketed at a lower cost and in a more timely manner than would be possible with any new band transmission system

Susquehanna recognizes that IBOC is not yet a proven technology. At this time, three separate systems are under final development and are entering a very demanding test phase, which will determine how well these systems work when subjected to the realities of our present allocation system, for both AM and FM stations.

Rulemaking, with the expressed intent of adopting IBOC as the technology to be used for bringing digital audio broadcasting to the United States is in the public interest.

The Commission should establish interference protection criteria to insure the compatibility of analog and digital radio transmissions.

All proponents of IBOC systems propose the use of a hybrid system that will allow for the simultaneous transmission of both an analog signal and a digital signal until such time that there will be an eventual transition to an all digital system.

Each of the IBOC developers recognize that their hybrid system will require certain technical tradeoffs in order to obtain optimum performance while, at the same time, minimizing possible degradation of the host station analog signal and providing sufficient protection to stations operating on adjacent channels.

It is probable that new emission masks will be necessary for stations operating in the hybrid mode and another set of masks will be necessary at a future date when these bands enter the all digital mode of operation.

Although today there may not be sufficient information to determine the specifics of the protection criteria required for IBOC, Susquehanna agrees with USADR in its contention that the development of interference criteria is a fundamental responsibility of the Commission. We support USADR's request that the Commission institute rulemaking proceedings to establish interference criteria designed to insure the compatibility of all radio stations, both analog and digital, during and after the transition to DAB.

USADR has proposed specific timetables for the adoption of a hybrid IBOC and the eventual transition to the all digital mode.

Susquehanna agrees that an orderly development and adoption of an IBOC digital broadcasting system and the eventual transition to an all digital system, in a timely fashion, is in the public interest. The time frame specified in the USADR proposal for setting a standard, although aggressive, appear to be reasonable. All three of the IBOC proponents have stated publicly that they expect to have their systems fully tested and ready to be submitted for adoption within the time frame outlined in the USADR proposal. Susquehanna supports the adoption of a schedule for the implementation of IBOC, as proposed by USADR, but suggests that establishment of the time frame for the transition to an all digital system could be delayed until other views are expressed through rulemaking.

The Commission should adopt a transmission standard that will allow the implementation of a single IBOC system in the United States.

Susquehanna recognizes the many problems and delays that are inherent in the development of technical standards, particularly when they involve several proponents that all provide similar, but different, competing systems. Susquehanna also understands the Commission's past reluctance in accepting the role of selecting and mandating a specific standard when there are more than one proponent. Nevertheless, without an FCC mandated standard, IBOC may never be implemented in any reasonable time frame.

The rationale for the selection of a single standard for the implementation of IBOC digital broadcasting for the United States is well documented in the USADR proposal and will not be restated here. Susquehanna was an early supporter of IBOC as the preferred solution for bringing digital broadcasting to the United States. We continue to support this technology through participation in the NRSC.

A single standard for an IBOC transmission in the AM and FM bands can be achieved by various means; through an industry group, such as, the NRSC, a *de facto* standard, if one proposed system is far superior to all others, or through a Grand Alliance. Regardless of how the standard is adopted, Susquehanna believes it will have little weight and will not be timely implemented, unless it is mandated by the FCC.

In summary, Susquehanna supports the USADR petition for Rulemaking and its request that the Commission initiate a proceeding to amend Part 73 of the Commission's Rules to permit the introduction of digital audio broadcasting (DAB) in the AM and FM radio bands.

Most importantly, the adoption of IBOC as the method of bringing digital audio broadcasting to the United States will send a strong message to receiver manufacturers who need this assurance in order to plan their production schedules for a fast and cost effective development of receivers. Of equal importance is the fact that the United States, through its leadership, can have a positive

effect on IBOC development in many parts of the world where the Eureka 147 technology is at a virtual standstill.

Susquehanna understands that rulemaking concerning new technologies is generally a long process and for that reason, we believe it is in the public interest to begin this time consuming process now, in order to develop the complete record that will be necessary for the Commission to bring digital audio broadcasting to the United States in a timely manner.

This requested rule making will serve many purposes:

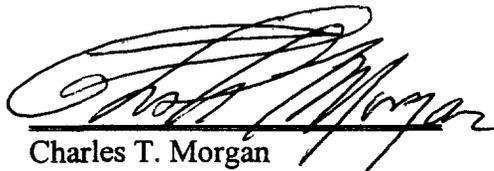
This rulemaking will provide a forum and develop a record concerning the advantages of an IBOC system over other alternatives for developing a terrestrial digital broadcast service.

The Commission will be able to develop a record concerning the compatibility of this new digital service with the analog service with which it must co-exist.

The Commission will be able to develop a record upon which it can draw in its effort to develop a standard or to adopt a standard developed by other means.

The Commission will be able to develop a record that will guide it in setting timetables for the implementation of IBOC and the eventual transition to an all digital system in a manner that best serves and protects the public interest.

As stated above, Susquehanna is a strong supporter of IBOC and believes that the implementation of this technology will (1) be spectrum efficient with no new allocations required, (2) conserve Commission resources by not requiring a new allocation scheme for the distribution of new services, (3) be cost efficient for both broadcasters and the purchasers of receivers, (4) bring digital audio broadcasting to the United States in a time frame that cannot be achieved by any other technology. For these reasons, Susquehanna believes that the adoption of IBOC as the standard for digital broadcasting in the United States is in the public interest.



Charles T. Morgan
Senior Vice President