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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
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Amendment of Part 73 of the)	
Commission's Rules to Permit the)	
Introduction of Digital Audio Broadcasting)	RM-9395
in the AM and FM Broadcast Services;)	
)	
Petition for Rulemaking of USA Digital)	
Radio Partners, L.P.)	
_____)	

COMMENTS OF GANNETT CO., INC.

Gannett Co., Inc. ("Gannett"), pursuant to the Commission's Public Notice on digital audio broadcasting ("DAB"),¹ hereby respectfully submits these comments in response to the Petition for Rulemaking filed by the USA Digital Radio Partners, L.P. ("USADR").² As a founding member of the USADR partnership and a participant in the group since its establishment in 1991, Gannett knows that the goals of the partnership are quite simple: to deliver to the American radio listener the high quality sound and benefits of an in-band, on-channel ("IBOC") DAB technology and to provide this with the most sensible technical and economic DAB system.

¹ Petition for Rulemaking, RM-9395, *Public Notice*, DA 98-2244 (Nov. 6, 1998).

² Amendment of Part 73 of the Commission's Rules to Permit the Introduction of Digital Audio Broadcasting in the AM and FM Broadcast Services, *Petition for Rulemaking* (filed Oct. 7, 1998) ("*Petition*").

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In its Petition, USADR requests a rulemaking to permit the introduction of DAB in the AM and FM bands. To bring DAB to the listener, USADR asks the FCC to adopt the use of IBOC technology. This technology allows broadcasters to place their digital signals within their existing channel on each side of the existing analog signal. This would enable the simultaneous broadcast of analog and digital signals during a transition period. Only later would the analog signal would be phased out completely. The IBOC DAB system would permit the implementation of DAB within the existing AM and FM regulatory structure and broadcasting infrastructure.

Gannett requests that the FCC act quickly on USADR's petition and institute a rulemaking proceeding to develop rules to implement DAB in the U.S. DAB is clearly in the public interest and will only enhance the existing AM and FM services. However, the implementation of DAB will require FCC participation in establishing the standards necessary to bring this technology to the public. Finally, as a partner in USADR's efforts regarding the IBOC approach to DAB, Gannett believes that the IBOC approach represents a superior means by which to bring DAB to the public quickly, economically, and without the need for additional spectrum allocations.

I. DIGITAL AUDIO BROADCASTING IS IN THE PUBLIC INTEREST

A. As the Commission Has Recognized in Other Contexts, Digital Technology Will Bring Improvements to Radio Broadcasting

The implementation of digital technology in the context of radio broadcasting will bring the advantages and benefits of this technology to radio. The Commission is well aware of the public interest in digital technology. For example, the Commission has expended a significant amount of resources to aid the process of introducing digital television to the American public.

Further, the Commission examined the benefits of digital technology in the audio broadcasting context in the satellite digital audio broadcasting proceedings and found the benefits sufficient to support the introduction of this new service.³

The same is true in the context of radio broadcasting – digital technology will improve this service too. Digital technology will improve the sound fidelity of AM and FM broadcasts. With digital technology, FM broadcasts will enjoy near CD quality sound while on the AM side, these broadcasts will have sound comparable to today’s FM.⁴ Digital processing of signals will also increase the robustness of the radio signal against interference, multipath fading and noise.⁵

B. The Public Interest Benefits in DAB Will Enhance the Significant Public Interest Benefits in Local Radio Broadcasting

Further, “going digital” will be necessary to preserve the economic health and viability of terrestrial radio for the future. As the FCC has long been aware, the consumer demand for digital products is increasing dramatically.⁶ For example, the Commission recently highlighted the digitization of wireless telecommunications as one of the top three trends in that industry.⁷

Consumers can, or will soon be able to, receive high quality audio digital programming from an

³ See Establishment of Rules and Policies for the Digital Audio Radio Satellite Service in the 2310-2360 MHz Frequency Band, IB Docket No. 95-91, *Report and Order, Memorandum Opinion and Order, and Further Notice of Proposed Rulemaking*, FCC 97-70 (rel. Mar. 3, 1997).

⁴ *Petition* at 14-15

⁵ See *Petition* at 15.

⁶ See *Amendment of the Commission’s Rules with regard to the Establishment and Regulation of New Digital Audio Radio Services*, 7 FCC Rcd 7776, 7778 (1992) (NPRM & FNOI).

⁷ See Annual Report and Analysis of Competitive Market Conditions With Respect to Commercial Mobile Services, *Third Report*, FCC 98-91, at 5 (June 11, 1998).

increasing number of sources, including, among others, cable, Internet webcasting, direct broadcast satellites, satellite digital audio radio, compact disks, and digital audio tape. Yet, despite the Commission's long time commitment to giving "existing broadcasters ... an opportunity to take advantage of new digital radio technologies,"⁸ the one source of programming still missing from this list is terrestrial radio.

The implementation of DAB will give to radio broadcasters the tools they will need to compete with these other digital technologies well into the future and preserve this valuable American resource. Radio is unparalleled in the numbers of people it reaches and the role it plays in society. Radio serves a vital public service as the purveyor of local news and information, and as a central part of the Emergency Alert System. Gannett agrees wholeheartedly with USDAR's statement that radio's "role in society cannot be overstated."⁹ However, the effectiveness with which it is able to continue to play this vital role depends upon its ability to compete with other modes of delivering the digital programming that the public demands. The implementation of DAB will keep radio competitive into the future.

II. THE COMMISSION MUST PLAY A CENTRAL ROLE IN DESIGNATING A DIGITAL AUDIO BROADCASTING STANDARD

Because of the technical characteristics of IBOC DAB systems and the nature of the radio market, the FCC should include a mechanism for government-mandated standards as part of its rulemaking proceedings. Such a body will be required to bring the benefits of DAB to the American listening public.

⁸ *Amendment of the Commission's Rules with regard to the Establishment and Regulation of New Digital Audio Radio Services*, 7 FCC Rcd 7776, 7780 (1995).

⁹ *Petition* at 5.

As the USADR petition illustrates, some sort of DAB standard will be required in order to guarantee the compatibility between DAB transmitters and receivers.¹⁰ Many of the different components of a any DAB system must be compatible or the system will fail to function as planned and the public interest benefits of the system will fail to materialize. For example, the specifications for forward error correction and interleaving codes must be able to work together in order for the system to achieve the enhanced robustness a digital signal can generate over a comparable analog signal. If a transmitter and receiver are operating on incompatible systems, the benefits of a DAB standard would be lost because the digital signal could not even be processed in the first instance anyway.

Even though the need for standards are critical to the success of DAB, the industry alone is incapable of establishing such standards given the nature of the radio broadcast industry. The industry is comprised of many different players – broadcasters, manufacturers, retailers, and consumers – all of whom have different agendas, incentives, and cost/benefit parameters. In fact, the divergent forces acting within one single group within the industry are probably enough to prevent coalescence around a set of standards even by that single group of players. For proof of the difficult nature of the radio broadcast industry, the Commission only needs to look at the history of the industry's less than successful implementation of AM Stereo.

Therefore, it is clear that the Commission must play a central role in evaluating, establishing and coordinating the implementation of DAB for terrestrial radio.

¹⁰ *Petition* at 95-96.

III. THE IBOC DAB APPROACH IS A WIN-WIN-WIN SITUATION

In Gannett's view, the adoption of an IBOC approach to the introduction of DAB is a situation where all of the key players involved come out winners. Therefore, Gannett would hope that the FCC's DAB rulemaking would include a full examination and consideration of this DAB technology.

The Commission benefits from the IBOC approach in two important ways. First, the Commission can ensure that the American public will get the significant benefits of digital technology without engaging in the difficult process of allocating new spectrum or different channels. Under IBOC, only existing allocations are used. Second, because no new spectrum or new channels are assigned, the Commission does not need to expend its scarce resources and endure the administrative problems attendant with the issuance of new licenses.

The broadcasting industry also benefits from an IBOC solution. For one thing, the broadcaster can acquire the significant benefits of digital broadcasting without losing the goodwill it has built up in its existing dial position. Under an IBOC approach, the broadcaster remains on the same channel. Also, because the IBOC solution allows for a long transition period, the costs to a broadcaster to move to digital are minimized as equipment is upgraded during the normal replacement schedule. Finally, because the IBOC approach does not require migration to new spectrum or channels, the industry saves the resources that would need to be expended in building a new broadcasting infrastructure that would accompany any spectrum move.

Last, but certainly not least, consumers win with IBOC. Of particular importance, because current analog equipment remains useful during the transition period, consumers will not find their existing radios, stereos and other analog AM/FM receivers to be useless for reception.

Following from this, consumers will find that their costs to upgrade to digital equipment will be dictated, not by technological need, but by replacement need. USADR has recommended a transition period that would allow consumers to replace their equipment within average replacement timelines.¹¹ As a result, a consumer's cost to upgrade will be minimized by the fact that replacement in an IBOC world will not be driven, primarily, by the technology, but rather by the fact that it is time to replace equipment.

IV. CONCLUSION

As we enter the 21st Century, it is time to bring the world of radio into the Digital Age that has transformed every other mode of audio programming. Not only is radio behind every other technology, as the Commission is well aware, the American listener is being left behind as Canada and Europe are implementing their versions of digital radio now.

If the Commission wishes to preserve the significant public interest benefits in an ubiquitous, free entertainment and information service into this new century, it must take steps immediately in that direction. The USADR petition provides the Commission with a path to follow to take those necessary steps. Gannett respectfully requests the Commission to act

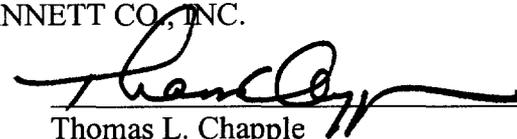
¹¹ *Petition* at 91.

quickly and initiate a rulemaking proceeding as proposed by USADR in its petition to bring the Digital Age to radio.

Respectfully submitted,

GANNETT CO., INC.

By:



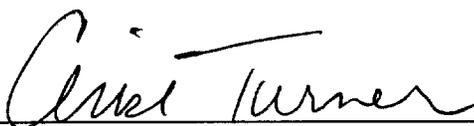
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The undersigned hereby certifies that the preceding document was delivered by United States first class mail (except as otherwise indicated), postage prepaid, to the persons listed below.

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