

BEFORE THE FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON D.C. 20554

IN THE MATTER OF A TERRESTRIAL DIGITAL RADIO SERVICE

PETITION FOR RULEMAKING

RM-9395

REPLY COMMENTS FOR RM NO. 9395

Introduction.

Citizens' Media Corps submits the following reply comments in response to RM No. 9395, which proposes the adoption of an in-band on-channel (IBOC) DAB technology.

First of all, we would like to put on the record our observation that the United States is the only country in the world which is attempting to implement an IBOC-type system. All other countries which are implementing digital radio are utilizing the system known as Eureka-147, a new band solution which has been endorsed by the World Administrative Radio Conference(WARC) and the World DAB Congress.

It is a matter of historical record that the American radio industry, as represented by the National Association of Broadcasters(NAB), initially welcomed Eureka-147 as a viable way to implement DAB. In fact, they applied to be the North American licensee of that system. After large radio group owners saw that their position of commercial dominance in the radio field was threatened by the implementation of Eureka, NAB withdrew its support and in about 1993 took up IBOC as its system of choice.

Since that time, tests on every available IBOC system have had negative results and reaffirmed Eureka-147 as the only viable digital system. This is not to say that the USADR system definitely won't work, but only to put it in historical context. Obviously, it serves no one if the USADR system is insufficiently tested and that any of the engineering elements tested "in-house" are taken for granted or assumed to be correct. Let me also note that even if IBOC proves workable on its own terms, there will remain a large discrepancy in audio quality between the AM and FM bands. In the Eureka system, there is no such discrepancy, with all channels capable of CD-quality sound(not "near-CD quality sound," which is promised for FM stations in IBOC).

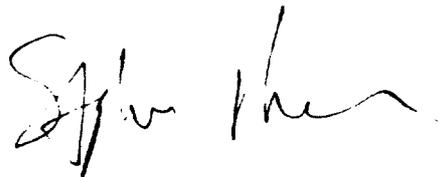
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We believe it would be in the best interests of the citizens of the United States for any digital system to be implemented in a new spectrum area, following the guidelines that have been set down by the World DAB Congress. It is by no means a foregone conclusion that new spectrum cannot be found. What is not lacking is spectrum, it is the will to prioritize finding that spectrum over the objections of the very powerful radio industry lobby. Establishing a digital service elsewhere in the spectrum would also allow the re-use of the current AM and FM bands for stations that would be created for the purpose of serving the public interest, not to pursue commercial dreams of glory.

Having said that, we would like to further note how important it is that any digital system be created with a low-power radio service in mind. Assuming the FCC does the correct thing and approves a low-power service, if a digital system is implemented without taking LPFM into consideration, this service will be defunct a few short years after it comes on line. The effort toward radio diversity that the FCC is trying so hard to create will have been rendered null and void.

We thank you for your time and consideration.

Submitted by,

A handwritten signature in black ink, appearing to read "Stephen Provizer". The signature is fluid and cursive, with a long horizontal stroke at the end.

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