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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

August 24, 1999

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**BY HAND**

Magalie Roman Salas, Esquire  
Secretary  
Federal Communications Commission  
The Portals  
445 12<sup>th</sup> Street, SW, Room TWB204  
Washington, D.C. 20554

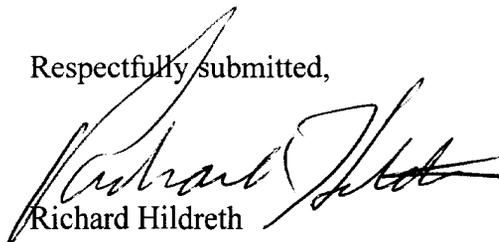
**Re: Indoor Sport and Entertainment Radio Service  
RM-9682**

Dear Ms. Salas:

On behalf of Inner Ear Communications, Inc., there is transmitted herewith an original and four copies of its *Reply Comment* to the above-captioned matter proposed by The National Hockey League.

Should any questions arise concerning this submission, please communicate with this office.

Respectfully submitted,

  
Richard Hildreth

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Enclosures

cc: Mr. Christopher J. Brennan  
Raymond J. Quianzon

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AUG 24 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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

In the Matter of )  
 )  
Indoor Sport and Entertainment ) RM-9682  
Radio Service )

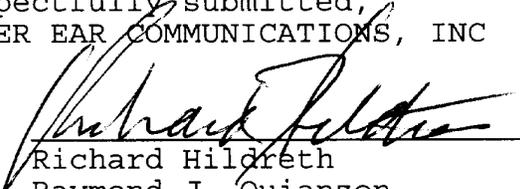
To: Chief Mass Media Bureau

Reply Comment of Inner Ear Communications, Inc.

Inner Ear Communications, Inc. (Inner Ear), by counsel, files this reply comment to highlight that comments received in this proceeding, save the comments of petitioner, are unanimous and resolute in their opposition to the petition as originally filed<sup>1</sup>. Inner Ear agrees with these comments to the extent that they argue that the FCC should not consider the pending petition.

Respectfully submitted,  
INNER EAR COMMUNICATIONS, INC

Dated: August 24, 1999

By:   
Richard Hildreth  
Raymond J. Quianzon  
Its Attorneys

Fletcher, Heald & Hildreth, P.L.C.  
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<sup>1</sup> See Statement of National Public Radio, Inc. at p. 10 urging "the Commission to deny the Petition. . ."; Comments of the National Association of Broadcasters at p. 10 requesting "that the Commission deny the NHL's Petition"; Comments of Micro Radio at p. 2 finding "the NHL proposal [] limiting and [] not represent[ative of] the interest of the general public". See also the Amendment of REC Networks at p. 1, although supportive of low power transmissions, revealing that its testing concluded "that the 60 dBu co-channel and 70 dBu adjacent channel interference standards would cause severe interference. . ."

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CERTIFICATE OF SERVICE

I, Joan P. George, a secretary in the law firm of Fletcher, Heald & Hildreth, do hereby certify that a true copy of the foregoing *Reply Comments of Inner Ear Communications, Inc.* was sent this 24<sup>th</sup> day of August, 1999, via United States First Class Mail, postage prepaid, on the following:

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Both individually and as CEO of Micro Radio  
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\_\_\_\_\_  
Joan P. George