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January 5, 2000 DOCKET FILE COPY ORIGINAL

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: MM Docket No. 99-325

Dear Ms. Salas:

These comments are being submitted by WTRW Incorporated (hereinafter "WTRW"), licensee of Standard Broadcast Station WTRW-AM in Two Rivers, Wisconsin in response to the Commission's Notice of Proposed Rulemaking concerning Digital Audio Broadcasting (hereinafter "DAB"). As President of WTRW in Two Rivers, Wisconsin; I strongly encourage the FCC to move quickly to authorize radio broadcasters to upgrade to DAB using In-Band On-Channel (hereinafter "IBOC") technology.

Radio broadcasting remains a part of everyday life for millions of Americans. It is a primary means of disseminating news, information, entertainment as well as emergency information in thousands of communities, large and small. Because of the important role radio broadcasting plays, the Commission should help to ensure the continued success of this broadcast service. It is our belief that IBOC DAB is an important part of radio's future.

USA Digital Radio's IBOC DAB system will provide both increased audio fidelity and enhanced robustness for radio broadcasts. This will allow radio broadcasters to overcome many of the limitations of current AM and FM broadcasting, to meet higher listener expectations and to provide new

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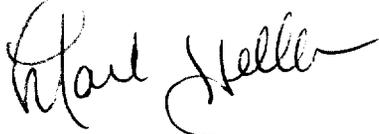
services to listeners. IBOC DAB is able to accomplish this without disrupting existing analog service and without the need for listeners to change the way they listen to radio.

The radio industry faces new challenges from high quality pre-recorded music, upcoming satellite-based digital audio services and cable-based and Internet-based audio programming. IBOC DAB will help enhance the ability of terrestrial broadcasters to compete with these new services at the same time it meets the needs of current listeners.

For these reasons, WTRW Incorporated encourages the Commission to take the appropriate regulatory actions to enable the expeditious implementation of USADR's IBOC DAB system in the United States.

Respectfully submitted,

WTRW INCORPORATED

A handwritten signature in black ink, appearing to read "Mark Heller", written in a cursive style.

Mark Heller, President

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