

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
)
Digital Audio Broadcasting Systems)
And Their Impact On the Terrestrial Radio) MM Docket No. 99-325
Broadcast Service)

Comments of Clear Channel Communications, Inc.

Clear Channel Communications, Inc. ("Clear Channel") hereby submits its comments in the above-referenced proceeding.¹ The FCC's Public Notice requests comment about In-Band On-Channel ("IBOC") Digital Audio Broadcasting ("DAB") technology. iBiquity Digital Corporation ("iBiquity") recently completed extensive testing of its FM IBOC system. Those test results were analyzed by the National Radio Systems Committee ("NRSC"). The NRSC's endorsement of the FM IBOC system and iBiquity's test results are now before the Commission.

Clear Channel is the nation's largest radio broadcaster with over 1200 AM and FM stations. Clear Channel's stations cover the entire United States, serving urban, suburban and rural markets. Based on its interest in promoting the radio broadcast industry, Clear Channel has a strong interest in the Commission's consideration of IBOC technology.

Clear Channel also is an investor in iBiquity and has worked closely with iBiquity to analyze the impact of IBOC on the radio industry. Some Clear Channel stations have even served as IBOC test stations in various markets around the country, giving Clear Channel additional insight into the conversion process of IBOC. Overall, Clear Channel has been pleased with the performance of the IBOC system on the Clear Channel test stations. Moreover, the

¹ *Public Notice*, DA 01-2932, MM Docket No. 99-325 (Dec. 19, 2001).

introduction of IBOC has not caused any disruption to these stations' existing operations nor has there been any degradation to the analog broadcasts.

Based on the Commission's overall record in this proceeding, Clear Channel encourages the Commission to take a number of steps. The Commission should clarify that it is no longer pursuing alternative approaches for terrestrial digital audio broadcasting. iBiquity has demonstrated that IBOC works, and the NRSC has validated iBiquity's findings. The Commission now has sufficient evidence to terminate consideration of any out-of-band solution for terrestrial DAB. This move will encourage receiver manufacturers to include IBOC in future designs.

The record also supports an affirmative endorsement of the iBiquity system. Terrestrial broadcasters will benefit from a clarification that the Commission is not considering any alternatives to this heavily and successfully tested system. As a final matter, Clear Channel encourages the FCC to allow the prompt commencement of digital broadcasting. Clear Channel recognizes that the Commission needs to develop final IBOC rules and a definitive IBOC standard. Nonetheless, IBOC's ability to be introduced without interference to existing analog operations affords the Commission the opportunity to streamline the introduction of IBOC. The Commission should allow stations to begin the transition to digital while the final IBOC rules and the IBOC standard are completed. This interim step will ensure that terrestrial broadcasters will have an immediate opportunity to offer their listeners the enhanced audio quality, reliability and services that IBOC will support.

Clear Channel encourages the Commission to expedite its consideration of IBOC, to provide a strong endorsement of the iBiquity system and to allow the prompt introduction of digital broadcasting.

Respectfully submitted,

CLEAR CHANNEL
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By:  _____

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