I am submitting these comments in reference to the proposed adoption of IBOC as the standard for digital broadcasting on the AM and FM broadcasting bands.

Contrary to the claims of its advocates, IBOC will not deliver improved reception to AM and FM band listeners. Instead, IBOC will cause a degradation of reception quality in the AM and FM, resulting in less satisfactory reception for most listeners and placing AM and FM broadcast stations at a competitive disadvantage to emerging satellite-based radio services and future 3G/4G cellular telephony services that can deliver streaming media via the internet.

The key failings of the proposed IBOC standard are:

1) The benefits of IBOC will not be realized unless the vast majority of radio listeners upgrade to IBOC-capable receivers. There is ample evidence, supported by the slow adoption rate of HDTV sets by the public, that the public may not upgrade to IBOC in sufficient numbers.

2) IBOC is currently proposed as a "daytime only" broadcasting mode, with existing analog transmission used at night to minimize skywave interference. This will further reduce market acceptance of IBOC and its adoption of the public; by analogy, would anyone buy a VCR or a personal computer that could be used during the day but not at night? If the public need for digital radio broadcasting is truly compelling, then the public interest is best served by adopting a system that can be used 24 hours a day.

3) The adjacent channel noise produced by IBOC will significantly degrade reception on non-IBOC receivers, especially on the AM band for listeners in the suburbs or outlying areas. Such degraded reception will likely hasten the exodus of listeners from the AM band and defeat the stated purpose of adopting IBOC on AM.

4) Because the United States is alone in its proposal to adopt IBOC, IBOC-capable receivers for American consumers will be expensive. This will further slow the adoption of IBOC by the public.

5) Other comments have addressed the questions concerning the validity of the technical tests of IBOC, in particular the effects of adjacent channel noise, skywave degradation, and reduced daytime coverage. I will not attempt to summarize those arguments, but I will add that such tests indicate that large parts of the American west could be left without reliable daytime AM broadcasting service if IBOC is adopted on the AM band. It is perhaps difficult for those living in the eastern United States to fully appreciate how spotty and unreliable daytime AM coverage can be in the western states, even in a populous area such as California. The argument might be made that AM broadcasters do not need to concern themselves with coverage beyond their intended service areas. However, the events of September 11 have forcefully demonstrated their is still a clear need for AM signal coverage over wide areas to provide a means of communications to the public in the event of a national emergency. Adopting IBOC for AM broadcasting---with its accompanying adjacent chanel noise and reduced daytime coverage---would leave large areas of the western United States and their population without a

potentially vital means of communicatons in a time of crisis.

I urge the commission to reject the adoption of the IBOC system for digital AM and FM broadcasting and instead explore alternatives that use a new frequency band dedicated to digital broadcasting. The Eureka 147 system being adopted in Europe and Canada is worthy of serious consideration by the Commission.

Respectfully submitted,

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