

Before the  
**Federal Communications Commission**

Washington, D. C.

In the matter of: )  
)  
Digital Audio Broadcasting Systems and ) MM Docket 99-325  
their impact on the terrestrial broadcast )  
service. )  
)

**ADDITIONAL REPLY COMMENTS OF REC NETWORKS**

1. REC Networks is a supporter of locally owned and diverse radio. REC currently operates several Internet only streams including Anime Hardcore Radio 1, Anime Hardcore Radio 2, Anime Hardcore Radio 3, Anime Hardcore Narrowband and Hardcore J. These stations feature primarily Japanese language music programming targeted to an English speaking audience. REC also operates several websites including the original LPFM Channel Search Tool. REC Networks also represents the interests of independently owned Low Power FM ("LPFM") broadcast stations and their listeners.

2. REC Networks is filing a reply to the Reply Comments filed by the Virginia Center for the Public Press ("Virginia"). In Virginia's comments, they are endorsing a Digital Audio Broadcasting solution in the L-band and at or around 220 MHz<sup>1</sup>.

3. REC is concerned about the Virginia's endorsement of the use of 220 MHz for DAB. Virginia uses the United Kingdom as a comparison . We remind Virginia that the spectrum in the UK is much different than the spectrum in the United States and other ITU Region 2 countries. The UK currently uses 217.5 to 230.0 MHz for Digital Audio Broadcasting<sup>2</sup>. In the United States, this spectrum is already well used by various services including the Amateur Radio Service, Automated Marine Telecommunications Service (AMTS), the 220 MHz Land Mobile band, Aeronautical Mobile, Radiolocation as well as the 218-219 (formerly IVDS) service.

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1 - Virginia's Reply Comments at Page 8.

2 - United Kingdom Table of Frequency Allocations 9kHz - 105GHz. (UK) Radiocommunications Agency publication RA-365, February 2000.

4. Just as much as REC is dedicated to preserving spectrum for Low Power Broadcasting, we also believe in preserving spectrum for the Amateur Radio Service at 219-220 and 222-225 MHz.

5. For the reasons mentioned, REC does support Virginia's position on DAB with the exception of the endorsement of a band for DAB around 220 MHz.

/s/ \_\_\_\_\_

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