

I am replying to John Wells King reply comments dated December 10, 2002. There is insufficient testing of IBOC HD Radio on night time AM radio station facilities, and its effects to consumer wide bandwidth AM radio receivers. In addition, due diligence interference studies are incomplete for first and second adjacent AM stations. At this point, to broadly approve iBiquity's HD Radio for nightly use would be detrimental to station owners and listeners alike. Further testing is needed to assess interference to first and second adjacent AM stations, using a varied assortment of AM receivers, and the FCC desired to undesired ratios. In addition, the NRSC mask was never created with digital IBOC HD Radio sidebands in mind. In actual practice, analog transmitters rarely modulate significant constant intelligence above 10.2kHz in each AM sideband.