Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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

To: The Commission

COMMENTS OF COX RADIO, INC.

Cox Radio, Inc. ("Cox"), by its attorneys, hereby submits these comments in response to the Commission's Public Notice[1] requesting comment on the National Association of Broadcasters' ("NAB") report proposing the use of separate antennas for the analog and digital components of the hybrid FM in band, on-channel ("FM IBOC") signal for the implementation of digital audio broadcasting ("DAB").[2] Cox, which was part of the *ad hoc* technical group that developed the NAB proposal, wholeheartedly supports this approach because it promises to speed the introduction of FM DAB. This proposal will give broadcasters an FM IBOC implementation option that in many circumstances will result in equivalent service at a greatly reduced cost.

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[1] Comment Sought on Use of Separate Antennas To Initiate Digital FM Transmissions, *Public Notice*, MM Docket 99-325, DA 03-3898 (rel. Dec. 8, 2003) ("*Notice*").

[2] Letter from Henry L. Bauman to Marlene H. Dortch, dated July 24, 2003, available at http://gullfoss2.fcc.gov/prod/ecfs/retrieve.cgi?native_or_pdf=pdf&id_document=6514287223.

Cox, either directly or through subsidiaries, owns and operates 65 FM radio stations throughout the United States.[3] Cox is a longstanding supporter of DAB and the FM IBOC transmission system, and 5 Cox stations already have commenced FM DAB operations.[4]. Cox believes that DAB will enhance FM service and listener experience, allowing over-the-air radio broadcasters to remain competitive in the digital age. Accordingly, Cox supports maximizing broadcasters' incentives to introduce DAB as quickly as possible. One way to accomplish this is to provide broadcasters with operational flexibility, so long as that flexibility does not impair relied-upon service. NAB's proposal that broadcasters be permitted to use auxiliary antennas for transmitting the digital portion of their signal would accomplish that goal.

Cox participated in the NAB-led *ad hoc* technical group that commissioned and examined the engineering analyses upon which NAB's proposal is based (the "Engineering Report"). Cox concurs in the *ad hoc* group's conclusion that for many broadcasters the auxiliary-tower solution will provide a significantly more cost-effective FM IBOC option than the currently authorized single-antenna configuration. For example, Cox believes that it could save at least $1.5 million by instituting two-tower operations at as many as 20 of its stations. These savings will result chiefly from the greater efficiency of auxiliary tower operation, which will allow Cox to use lower power transmitters without sacrificing signal quality. The lower costs for these stations will allow Cox to allocate funds to the digital conversion of its other stations, speeding Cox's transition to DAB.

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[3] Together with several other radio broadcasters, media companies, and consumer electronics manufacturers, among others, Cox holds an ownership interest in iBiquity, the IBOC system that the Commission has approved for implementation of DAB.

[4] These stations include WSB(FM), Atlanta, Georgia, WEDR(FM), Miami, Florida, WFOX(FM) Gainesville, Florida, WALR-FM, LaGrange, Georgia, and WBTS(FM), Athens, Georgia.

As the Engineering Report shows, stations across the radio broadcasting industry could generate substantial savings without significantly impairing existing analog service or generally diminishing individual stations' digital service areas. None of the three stations using experimental auxiliary-tower operations exhibited any impairment of existing analog operations. Equally important, in most cases DAB signal coverage using the auxiliary-tower solution is comparable to that achieved using a single tower. The single incidence of decreased signal coverage noted in the case of KDFC-FM affected only a portion of that station's service area and should not cause great concern. During the implementation phase of DAB, broadcasters should be permitted to utilize technical solutions even if the resulting digital operations do not provide precise duplication of their stations' analog service areas. No loss of service would result from airing a non-replicating DAB signal because analog service will continue to be available without interference. In the future, as DAB begins to supplant analog as listeners' preferred reception format, the Commission could always consider requiring replication, but such a standard would be inappropriate for some time.

In its particulars, NAB's proposal is eminently reasonable. To institute FM IBOC operations using the auxiliary antenna alternative without requesting additional authority from the Commission, a broadcaster must use a licensed auxiliary antenna that is within three seconds of latitude and longitude of the main antenna and has a height above average terrain of between 70-100% that of the main antenna. If a station does not meet these requirements, NAB requests that the Commission evaluate proposals for auxiliary antenna operations on a case-by-case basis. The antenna location and height restrictions will ensure that broadcasters can realize the beneficial effects of auxiliary tower operations without risking interference to existing service. Cox agrees that stations which do not meet these requirements should be permitted to show that

they nonetheless can provide interference-free FM DAB service to their listeners. Upon the proper showing, the Commission should permit such stations to commence FM IBOC operations.

NAB's auxiliary antenna proposal shows great promise for immediately enhancing the viability of FM IBOC operations for many stations and increasing the availability of FM DAB to listeners across America. By increasing the speed of stations' implementation of FM IBOC operations, this proposal also will help stimulate receiver production and consumer adoption – key components of the successful transition from analog to digital radio. Because NAB's proposal promises great benefits for the digital radio transition without any identifiable drawbacks, the Commission should approve it without delay.

Respectfully submitted,

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