



Albert Shuldiner
Sr. Vice President & General Counsel

March 5, 2004

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: MM Docket No. 99-325

Dear Ms. Dortch:

iBiquity Digital Corporation ("iBiquity") hereby submits the following reports concerning nighttime operation of its HD Radio™ IBOC system:

1. AM Nighttime Compatibility Study Report dated May 23, 2003
2. Field Report – AM IBOC Nighttime Performance dated October 20, 2003
3. Field Report – AM IBOC Nighttime Compatibility dated October 31, 2003

These reports were prepared for and presented to a committee of the National Association of Broadcasters ("NAB") formed to consider the implications of authorizing the introduction of nighttime AM HD Radio broadcasts. In particular, the Committee considered the potential performance of the digital system at night as well as the potential impact of new digital transmissions on existing AM analog nighttime operations.

It is iBiquity's understanding that the NAB has filed with the Commission the Committee's conclusions as well as the NAB Radio Board endorsement of nighttime AM IBOC transmissions. iBiquity is filing these reports to complete the Commission's record on the nighttime AM HD Radio issue.

Please do not hesitate to contact the undersigned if there are any questions concerning these reports

Respectfully submitted,

A handwritten signature in black ink that reads "Albert Shuldiner". The signature is written in a cursive, flowing style.

Albert Shuldiner