Before the
Federal Communications Commission
Washington, D. C. 20554

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

To: The Commission

Comments of Sage Alerting Systems, Inc.

Sage Alerting Systems worked closely with the Federal Communications Commission in 1995 and1996 to help develop the Emergency Alert System equipment presently used by many radio and television broadcasters. Sage would like to comment specifically on paragraphs 37 and 38 of the Notice dealing with the Emergency Alert System.

Radio broadcasters need to be competitive in the multimedia world which has already converted to digital transmissions and storage. Ibiquity's development of HD radio technology should help AM and FM broadcasters provide an enhanced and improved service to their listeners. As listeners hear about the performance improvements in fidelity, reduction of noise and interference such as multipath, they will purchase new HD radios, as soon as stations launch services in their area. In a few years, one can imagine a large percentage of listeners listening exclusively to the digital stream of AM and FM radio broadcast stations. *We therefore believe it is imperative that AM and FM stations provide Emergency Alert System services on both their analog and digital facilities. The failure to do so would deprive many listeners of warnings and alerts vital to health and safety*.

The ability to transmit digital data and control information along with the encoded audio streams could lead to new and even more effective ways of reaching the public with emergency messages and announcements. Not only can the display on HD radios in cars and homes carry specific and localized information about emergency events, but the capability exists to selectively turn "off" radios "on" through the use of this data stream. Addressability down to a much smaller area than is currently possible in the EAS protocol would facilitate reaching only those who would be directly effected by severe weather, chemical releases, or terrorist activities. These capabilities would be a vast improvement over the existing EAS

system and could be implemented either voluntarily or by FCC mandate in all new AM and FM receivers equipped with HD radio.

The use of non-correlated digital and analog entertainment and information, as exemplified by “Tomorrow Radio”, will undoubtedly capture the imagination of broadcasters and the listening public. It will therefore be necessary to interrupt both the analog and digital channels either simultaneously or sequentially depending on programming content. This will require a digital EAS device, which will sit in the AES/EBU data stream from the studio to the exciter, capable of replacing the programming content with emergency alert and warning information.

The notice asks about the cost and timing for broadcasters to be in compliance with proposed FCC EAS rules. We believe that the cost of implementing the digital interrupt technology will be no greater than the current cost for a new analog station. We also believe that products can be brought to the market very quickly and in fact, Sage already displayed a digital ENDEC prototype at the 2004 NAB Convention in Las Vegas. Existing Commission rules on equipment certification need to be updated to include both analog and digital performance requirements.

Conclusion

Sage Alerting Systems believes that the Commission should quickly adopt rules authorizing full time use of IBOC technology on AM and FM stations. This will not only provide listeners with the digital experience they have come to expect from satellite radio, MP3 players and digital television, but it will enable significant advances in alerting and warning technology through the use of the digital data stream on AM and FM HD radio stations. The Commission should require EAS compliance from the very beginning to insure that listeners tuned to the digital data stream do not miss potentially life saving messages and announcements. The commission should begin an investigation into new and improved alerting techniques enabled by digital broadcasting.