

FCC FILING

TO: Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Washington, DC

FM: Craig Curtis, KPCC Program Director
Southern California Public Radio
261 South Figueroa Street, Suite 200
Los Angeles, CA 90012

DT: June 16, 2004

RE: MN Docket No. 99-325

Dear Ms. Dortch:

Southern California Public Radio enthusiastically supports FCC authorization for HD radio and resulting supplemental audio channels. There are four principal reasons we believe this will be good for the public and for public radio: 1) Improved broadcast quality, 2) Additional program choice, 3) Opportunity to reach new and under-served audiences, 4) New potential revenue streams.

QUALITY. A digital signal represents a significant improvement over current analog broadcast standards. This is important to all broadcasters, as we face high-quality audio competition in cars, homes and offices from CDs, MP3 players, rapidly improving internet streaming, and other digital audio formats. (With television moving to digital standards, over-the-air radio will be one of the last remaining analog mediums.) In addition, the HD radio signal seems to address multi-path problems faced by many stations. This is especially true for KPCC, where our 600-watt analog signal has difficulty penetrating office and apartment towers in the Los Angeles area. Early tests of the HD radio transmitter show significant improvement.

PROGRAM CHOICE. HD radio with its SAC capacity will allow us to provide additional public service broadcasting to the Los Angeles area. While we have not yet settled on the precise content of a second audio stream, possibilities include a full time Spanish language public radio service, more live events coverage (congressional hearings, local council meetings, etc.) or other public service programming not currently on the air in Los Angeles.

UNDER-SERVED AUDIENCES. SAC capacity would also allow for the kind narrowly focused programming, perhaps in multiple languages, not now feasible for broadcast on a full service FM radio station. This could allow KPCC to reach unserved or under-served audiences in Los Angeles. Even though Los Angeles is the second largest media market in the United States and has many broadcast outlets, it is also the most racially and

ethnically diverse city in America, perhaps the world, so the ability to reach out to new and growing immigrant populations is very important.

REVENUE. As public radio continues to lessen reliance on federal or local government funding, HD radio and SAC may provide opportunities to generate new and additional revenue. This revenue could come by traditional public radio mechanisms--membership and underwriting--but there may be other new ways to use the SAC for revenue generation that we can not yet imagine.

In conclusion, we strongly encourage the Commission to authorize HD radio and SAC for public radio. We understand that as non-commercial broadcasters there will be some practical and appropriate restrictions on our use of HD radio and SAC, but we hope these can be kept to a minimum allowing us to identify and provide the program services of greatest value to our local audience, and to identify and pursue possible new funding mechanisms.

In the last four years KPCC has built its weekly audience from 250,000 to 400,000. These new services should allow us to provide multiple high-quality services to citizens of the Los Angeles area.

Sincerely yours,
Craig Curtis
KPCC Program Director
Southern California Public Radio

Craig Curtis
Minnesota Public Radio
89.3 KPCC, Pasadena
ccurtis@mpr.org
ccurtis@kpcc.org
651-290-1400