



ROCKY MOUNTAIN CORPORATION FOR PUBLIC BROADCASTING

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June 16, 2004

Marlene H. Dortch, Secretary  
FCC  
Washington DC 20554

Re: Docket 99-325:  
FNPRM on  
Digital Radio

INFORMAL COMMENTS  
IN RESPONSE TO THE REQUEST FOR  
COMMENTS ON HD RADIO AND SAC CAPACITY

1. The Rocky Mountain Corporation for Public Broadcasting (RMCPB) respectfully files informal and timely further comment on MM Docket No. 99-325.
2. RMCPB is a membership organization of public broadcasting stations and entities in the Rocky Mountain states, independent of the Corporation for Public Broadcasting and receiving no federal funding. Its purpose is to enhance development and operation of public broadcasting in the Rocky Mountain States—and increasingly to protect and ensure service to our rural communities and areas.

Our citizens in remote and isolated areas enjoy the free commercial and non-commercial broadcast services they deserve, and need, because the Commission wisely authorized translators to meet the special geographic, topographic and demographic challenges of this region.

Since 1968 RMCPB has assisted Public Radio stations in the Rocky Mountain states in securing FCC authorization, and PTFP funding assistance, for stations, translators and interconnection facilities to extend service to the unserved and maintain existing service in our vast and thinly populated region. And we have endorsed and urged state and national policies and regulations conducive to that end.

We submit these comments reacting within the context of the special challenges of our unique region and the necessity for rural NCE-FM public radio service in it.

3. In 2002, when RMCPB supported adoption of the iBiquity IBOC-FM system, the prime factor was our vision of the special public radio opportunities inherent in **A/B program stream** capability. (From our perspective HDR audio's near equivalence to CD audio was a desirable but somewhat incidental bonus).

Our 2004 focus is unchanged. In our enthusiasm for the public service potential to *extend public radio program services*, **we applaud the FCC's tentative conclusion that rules encouraging more audio streams will promote diversity and that radio stations will no longer need experimental authority to broadcast multiplexed digital programming.**

4. When revolutionary technology is employed, it should produce consonant societal impact. It should not result in merely evolutionary improvement in degree but not in kind. To improve public radio audio quality from excellent to more than that is certainly desirable and well worth doing, but the change is incremental—and by itself lamentably short of HDR's true public radio potential.

To settle for less than what could be would be like having River City's mythic band—76 trombones and all its trumpets, basses and drums—lined up and ready to go, but subbing with a single fife and drum to lead a one-horse, one-convertible, one-float parade.

**Public radio's mandate—and the public interest—deserve better.**

And require more: **System-wide ability to multiplex expanded program services and extend those enhanced services to the rural communities and areas our public radio stations serve.**

Absent “last mile” ability, the proposed policy would deprive substantial numbers of citizens in our remote, rural and isolated areas of the free broadcast enhanced radio services they **deserve**—and **need** far more than those in metropolitan areas.

5. Quick to see special public radio opportunities in **multiplexed program stream** capability, Rocky Mountain PT stations dream dreams and see visions. For example:

**KUWR-FM Laramie WY (Wyoming Public Radio**, “*a rural statewide network with 14 transmitters and numerous translators*”):

*“Wyoming Public Radio would immediately implement a new and separate radio service for Wyoming citizens. Our current plans include establishing a 24 hour, seven days per week classical music network within the state. Wyoming now has no fulltime broadcast of classical music from within the state, available to all. If we are successful in obtaining second stations in cities across the state, our intention is to multiplex them as well... We are considering minority citizen service for Hispanics in the state, in partnership with a new LPFM Hispanic citizen group”*

**Nevada Public Radio** (licensee of KNPR and KCNV in Las Vegas; KTPH, Tonopah; KLNR, Panaca and KWPR,Lund/Ely:

*“Our classical music formatted station in Las Vegas, KCVN, is in the process of converting to digital broadcasting using the iBiquity Digital Corporation’s HD Radio system. We plan to begin offering digital service on KCVN no later than December 2004... The implementation of Secondary Audio Channels is highly desirable for... Nevada Public Radio to serve additional audiences with new program services, to expand program diversity and as a possible new means of raising revenue... could offer the Secondary Audio Channel on a subscription basis to subscribers with programming completely free of underwriter announcements or pledge drives... Nevada Public Radio operates eleven translators over a 49,000 square mile area in Nevada and adjacent areas of California, Utah and Arizona. We have also in the last year split our previous dual format station KNPR into two stations: one solely devoted to news and information and one exclusively for classical music. It is our long-range goal to duplicate that dual service throughout our urban and rural service area. In the analog world that would have meant applying for duplicative translator and associate stations with the associated lag time for applications to the Commission and expense of duplicating the needed infrastructure. We encourage the development and implementation of dual-output DAB translators so that dual services can be broadcast via one translator. It would be much more efficient to augment the existing translator network to receive and transmit both program services using DAB Secondary Audio Channels without having to apply for new translators to serve the same geographic area with single outputs per translator.”*

**KANW-FM Albuquerque NM** (New Mexico’s oldest FM station):

Recipient, with KUNM-FM Albuquerque, of an \$85,000 CPB digital conversion assistance grant to replace their shared antenna system. Known for the best election night coverage in the state (NCE or commercial, radio or TV) and for “New Mexico Music” (its programming staple).

Would promptly implement a second program stream—possibly classical music (in greater depth than the available commercial service) and/or to air a wealth of good programs from national, regional and station sources there is simply no room for on the analog channel. And, in the long run, quite possibly a new educational/instructional service to address critical curricular lacunae in New Mexico’s public school systems.

6. Stations could immediately escape the horns of the common dilemma of talk-news vs music programming.

More importantly, public radio will be *enabled*--as it cannot be with single channel analog--to play a significant role in *addressing inequality of educational opportunity* in our states and *bringing educational resources from where they are to where they aren't*.

7. But—despite the vision and the dreams, despite the manifest public interest and public service virtues of multiplexed program service—here in the real world of our mountain states we perceive a truth we hold to be self-evident:

**No matter how beautiful the sound,  
nor ecstatic the audiophile,  
the game is simply not worth the candle  
in our region  
without SAC multiplexing!**

8. Lastly, we see yet another benefit accruing from widespread public radio use of the SAC to simulcast multiple program streams from a single transmitter.

Critics, pundits, denizens of the Hill (and of the Portals) and a chorus of assorted Chicken Littles mutter, and mumble and grumble about the concentration of station ownership and control in too few hands and the resulting clear and present danger to *localism*—indeed a serious and valid matter for concern.

We submit that the public radio system is the last and best bastion of defense protecting localism and that a multiplicity of diverse program streams from the multiplicity of diverse local licensees cannot but aid and abet the cause of localism.

In sum, RMCPB commends the Commission stance and its tentative conclusions in re a new DAB policy encouraging more audio streams. And we endorse and recommend adoption of such a policy enabling public radio **to multiplex expanded program services and extend those enhanced services to the rural communities and areas our public radio stations serve.**

Respectfully submitted,

ROCKY MOUNTAIN CORPORATION FOR PUBLIC BROADCASTING

By E. W. Bundy /s/

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