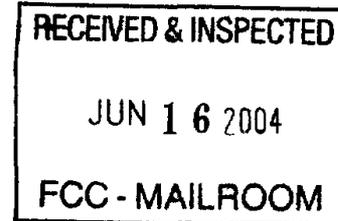




June 15, 2004

WHA Radio
821 University Avenue
Madison, WI 53706



Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
9300 East Hampton Drive
Capitol Heights, MD 20743

RE: MM Docket No. 99-325

Dear Ms. Dortch,

WHA-AM is a licensee of the University of Wisconsin Board of Regents and an affiliate of Wisconsin Public Radio, a statewide network of 24 transmitters and 3 translators. WPR produces two complementary 24-hour broadcast services tailored to the listening preferences of its stations' audiences: the *NPR News and Classical Music Network* and the *Ideas Network* featuring talk and call-in programming. WHA, in Madison, Wisconsin, serves as the primary production center for the 17 affiliates of the *Ideas Network* and its members. We at WHA are writing the Commission to emphasize our commitment to making important uses of the benefits of HD Radio, particularly the Supplemental audio channel capacity (SAC), to better serve our listeners.

Expanded Coverage

Even with this large contingent of stations and a dual-network service, we are too often unable to deliver both of our program services to all parts of the state. In these areas a Supplemental Audio Channel (SAC) would allow nearly all residents of Wisconsin to listen to the WPR service of their choice. Further, the enhanced sound quality of HD signals will improve our main channel music service for current listeners and likely attract new audience members as well at additional marginal costs.

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■ 821 University Avenue, Madison, WI 53706 ■ (608) 263-3970 phone ■ (608) 263-9763 fax ■

Enhanced Services

Listeners to WHA and our *Ideas Network* over the years have consistently asked for more special news and public affairs services (e.g., live carriage of state legislative hearings, election coverage, etc.) that we cannot fit into our current program schedule. A supplemental audio channel would provide us with a very cost-effective means of expanding the content and variety of local and statewide programming to diverse audience segments including second-language services.

Serving Diverse Communities

On this latter point, with Wisconsin as home to the second largest community of Hmong-speaking citizens in the United States, WPR is currently offering a non-broadcast foreign language service via Sub Carrier Authority to the Hmong community in northwestern Wisconsin. A SAC option would allow us to expand this service to other Hmong residents in our central Wisconsin service area and would relieve these audience members of the cost of acquiring SCA receivers.

Increasing Educational and Cultural Services

Another prospect for increasing our public service is our *Chapter A Day* program, which has been broadcast on public radio stations in Wisconsin since the early 1930s. This daily service (Mondays-Fridays), produced by WHA and featuring full-length readings of fiction and non-fiction books by leading writers, holds promise for extended services via SAC to libraries and other public entities serving the visually impaired.

Promoting the Conversion to Digital Broadcasting

WPR has already begun converting several of its stations to HD radio on a ten-year plan, with 4 stations scheduled to come on line by June, 2005 with the remaining 20 stations to follow by June of 2008. The State of Wisconsin has been willing to provide the critical mass of funding for this initiative due, in part, to the prospect of the SAC providing a cost-effective means of significantly increasing our public service capacity. By adopting a policy that formally supports DAB service rules that encourage additional audio streams such as the SAC, it is our view that the FCC would foster continuing support for digital conversion by state and other public funding sources throughout the country.

SAC Comments

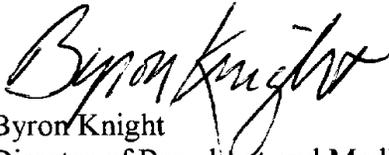
Re: MM Docket No. 99-325

WHA-AM

Page 3

Along with our colleagues at NPR, we believe that beyond authorizing the use of HD Radio technology to offer supplemental audio channels, the FCC's goals will be well served by providing non-commercial educational stations with maximum flexibility to serve the needs and interests of our listeners. Public radio stations like WHA and the other member station of Wisconsin Public Radio share a mission to serve the public's educational needs and have a proven track record of successfully doing so. Public radio counts on the FCC to fully protect our ability to serve that programming mission. Public radio stations also need to generate revenue to fund our activities. The potential use of SAC technology for remunerative purposes will strengthen our ability to continue to serve the public better into the future.

Sincerely,

A handwritten signature in black ink that reads "Byron Knight". The signature is written in a cursive style with a large, prominent initial "B".

Byron Knight
Director of Broadcast and Media Innovations
University of Wisconsin-Extension
For WHA Radio

Attachment: *Wisconsin Public Radio Overview*

WISCONSIN PUBLIC RADIO OVERVIEW

WPR's *Ideas Network*: Information, Public Affairs and Listener Access

WHA-AM is the lead producing station for the 17 affiliates of *The Ideas Network of Wisconsin Public Radio* that serves a weekly cumulative audience of 399,600 listeners and an average quarter hour audience of 25,300¹. WHA's programming engages state residents in discussion and analysis of current issues by producing over 25 hours of live call-in programs each week. These statewide broadcasts, featuring in-depth discussions with newsmakers, lawmakers, authors, experts, public officials and university faculty, provide an open forum for Wisconsin citizens to participate in live discussion and debate on issues and ideas affecting their daily lives. In addition, the Ideas Network broadcasts 30 hours of national call-in programs each week in which Wisconsin citizens have the opportunity to enter the national conversation on these and other issues of importance to them and their communities

The WPR News and Classical Music Service

The WPR News Department produces a daily statewide news service that is heard on all of WPR's 27 stations. The WPR News Staff keeps Wisconsin citizens informed about current and breaking news of state and local interest with regional coverage originated by reporters staffing bureaus at Eau Claire, Green Bay, La Crosse, Milwaukee, Superior and Wausau, as well as in Madison. These regional broadcast facilities also produce weekly programs of interest to audiences in their areas. During 2001, the Wisconsin Associated Press named WPR's news department as the "Outstanding News Operation" among its member agencies. The 10 stations of Wisconsin Public Radio's *NPR News and Classical Musical Network* also feature more than 40 hours of national news magazine and public affairs programming from National Public Radio (NPR) in Washington, D.C., including "Morning Edition" and "All Things Considered".

Additionally, through webcast audio streaming, the program services of both WPR networks reach listeners across the country and even internationally.

Creative partnerships enable Wisconsin Public Radio to strengthen its promotion and outreach strategies while building new audiences. For example, WPR has collaborated with Wisconsin Public Television to develop a website featuring text, audio and video of election information and voting tabulations. The two WPR broadcasting networks continue their partnership in the "We the People" civic journalism project, with WPR producing series on such topics as the state Supreme Court election. Other outreach projects have included programs and initiatives on health issues for the elderly and baby boomers and, most recently, a *Preserving Cultures* series.

¹ Source: Arbitron-Radio Research Consortium, Inc. Primary Signal Area Report (PSA) AQH & Cume 12+, Mon-Sun, 6AM-12M, Spring 2003.