

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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

Reply Comments of
Cohen, Dippell and Everist, P.C.
On the Use of Digital AM Transmission
During Nighttime Hours

The following Reply Comments on the Further Notice of the Proposed Rulemaking and Notice of Inquiry (“Further Notice”) are respectfully submitted by the consulting engineering firm of Cohen, Dippell and Everist, P.C. (“CDE”) on MM Docket No. 99-325. CDE or its predecessors have been providing consulting engineering services to the broadcast industry for over 60 years.

This firm supports the comments filed by WGN Continental Broadcasting Company, licensee of WGN(AM), Chicago, Illinois (“WGN”). In particular, support is given to the specific time proposal during which AM stations are permitted to operate. In other words, IBOC implementation should be limited to prescribed times that would be basically daylight hours.

Further, WGN addresses the issue that unlimited IBOC operation can introduce interference to normally protected service areas. Until such time as the IBOC interference methodology can be formulated, the risk of interference cannot be determined.

In addition, as stated by WGN, it is imperative that notification procedures be maintained. This will assist stations experiencing interference to identify the stations operating with IBOC .

Respectfully Submitted,

COHEN, DIPPELL AND EVERIST, P.C.

Donald G. Everist
President

Date: July 14, 2004