Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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

REPLY COMMENTS OF CLEAR CHANNEL COMMUNICATIONS, INC.

Clear Channel Communications, Inc. ("Clear Channel") hereby submits its reply comments in the above-captioned proceeding. These reply comments are intended to clarify and expand upon Clear Channel's initial comments regarding digital audio broadcasting ("DAB") service by AM stations using in-band, on-channel ("IBOC") technology.

In its initial comments, Clear Channel stated its general support for permitting AM stations to implement nighttime IBOC service. Clear Channel, however, expressed its belief that the notification procedure for interim nighttime AM IBOC operation should be codified and changed significantly from the procedure now in existence for daytime AM operation, which essentially places an advance determination as to whether IBOC operation will cause harmful interference solely in the hands of the licensee seeking to implement the operation. Clear Channel proposed that the Commission institute a formal notification and comment process by which an AM licensee seeking to implement nighttime IBOC service must notify all potentially affected stations in writing sufficiently in advance of the proposed implementation, after which affected stations would be given a period of time to object or be deemed to have consented.[1]

[1] See Clear Channel Comments at 6-7. Clear Channel further proposed that, in the event an affected station objects to the proposed IBOC implementation and a resolution cannot be reached before the planned implementation date,

With respect to AM DAB service generally, Clear Channel suggested that the Commission carefully study, define, and codify precise definitions of prohibited interference and interfering and protected contours.[2]

Regarding its proposed advance notification process for AM licensees seeking to commence nighttime IBOC service, Clear Channel's comments left open the question of what stations would be considered "affected" by such service and thus entitled to advance notification. Clear Channel suggests that "affected stations" be those stations for which the station proposing IBOC operation contributes to the nighttime RSS value using the 25% exclusion method. As an alternative to a direct written notification procedure, Clear Channel believes it acceptable to adopt a more streamlined process. For instance, the Commission might require a station seeking to implement nighttime IBOC operation simply to file with the Commission a notice of the planned implementation sufficiently (perhaps 60 days) in advance of the implementation, providing the planned date on which nighttime operation will commence. The Commission would then promptly post the call sign and location of the notifying station, and the planned commencement date of nighttime IBOC operation, on a Commission website list of all stations which have filed such notifications. Stations that believe they would be adversely affected in their primary service area by the proposed operation could use this period to raise objections and provide technical studies illustrating the grounds for their objection. Such a procedure, by requiring the filing of a single notification with the Commission in lieu of multiple notifications to affected stations, would simplify the advance notification process.

(Continued . . .)
the Commission should direct the implementing station to reduce digital power by 6 dB pending resolution of the objection. Id. at 7.

[2] Id. at 7-8.

Clear Channel's comment that the Commission should "carefully study, define, and codify precise definitions of prohibited interference, and interfering and protected contours, in the digital AM context"[3] was not intended to suggest a concern about distant skywave interference from AM IBOC operations. Rather, the *FNPRM* speaks of interference and interference remediation procedures, but the area in which an AM licensee can be expected to be protected from interference is not defined. Under the current analog operation, an AM station can be expected to have noise-free reception to the extent of its nighttime interference free ("NIF") contour. However, based upon its extensive experience, Clear Channel believes that the vast majority of stations enjoy very usable coverage to a level that is 50% of the NIF. For example, a station with an NIF of 10 mV can expect to serve the majority of its listeners with a field strength of 5 mV or greater. Alternatively, Class A stations can expect listeners within their 0.5 mV-50% skywave contours. The *FNPRM* is unclear about precisely which (if any) of these contours the Commission intends to establish as protected from AM DAB interference. Clear Channel assumes, for example, that the Commission does not intend DAB operations to protect other AM stations' nighttime skywave service. However, the area receiving field strengths equal to or greater than one half of the existing NIF calculation might be a perfectly reasonable standard to adopt. In any case, Clear Channel's comments were intended to suggest that the Commission should study and define with precision the appropriate protected contours for AM stations in the DAB environment.

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[3] Id. at 7.

Conclusion

Clear Channel trusts that these reply comments will clarify its earlier comments on several AM technical issues. It reiterates its support for DAB and its belief that a market-driven transition, coupled with careful and specific interference rules, will best serve the interests of radio licensees and consumers.

Respectfully submitted,

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