

**Before the
Federal Communications Commission
Washington, DC 20554**

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

**Reply Comments on
National Radio Systems Committee’s
“In-Band/On-Channel Digital Radio Broadcasting Standard NRSC-5”**

The following Reply Comments are submitted by the Crawford Broadcasting Company (“Crawford”) in response to comments submitted by various entities in the above-captioned proceeding. Crawford and its affiliates are licensees of twenty-nine terrestrial radio stations, including eleven FM and eighteen AM stations.

Crawford has for many years operated on the leading edge of technological advancements, taking the lead so as to advance the state of the art and provide a path for others to follow. Crawford was among the first to transmit In-Band/On-Channel (“IBOC”) digital signals when such transmissions were first authorized¹. Crawford has since commenced IBOC transmissions on six additional FM stations. Construction is underway on IBOC transmission facilities at all the remaining FM stations within the company and four of the AM stations. Further, Crawford has obtained Experimental Authority from the Commission to commence digital multicasting tests on all its FM stations.

We firmly believe that in order to remain viable and competitive, terrestrial radio must provide FM and AM transmission media that are different and better than the current analog schemes. With the advent of many alternatives, all of them digital in nature, consumers have come to expect a certain level of quality and performance that terrestrial broadcast radio cannot deliver in its analog form. The limited audio bandwidth and monaural nature of AM broadcast transmissions along with heterodyne beats, static and electrical noise are unacceptable to many consumers – especially younger consumers, particularly when they have high-fidelity, noise-free

¹ Dontron, Inc. WPWX(FM), 222B, Hammond, Indiana (Fac. ID 17304) began IBOC transmissions July 1, 2003.

alternatives. Even the FM broadcast transmissions, with occasional multipath and flutter, do not measure up to today's consumer expectations. If terrestrial broadcast radio is to remain viable and relevant, it must address these issues and move toward parity with other modern media.

We further believe that the window in which such change can be successfully implemented is relatively narrow, particularly for AM. Our industry has, by and large, well learned the lessons of the past. The failure of AM Stereo to gain a foothold because a standard was not set early on is very much part of our institutional memory. We must avoid repeating this mistake.

As such, we join with The Walt Disney Company and ABC, Inc.; the National Association of Broadcasters; Entercom Communications Corporation; Greater Media, Inc.; National Public Radio, Inc.; Susquehanna Radio Corporation and others in encouraging the FCC to move expeditiously to adopt the NRSC-5 Standard and to develop rules that insure compliance with the Standard as submitted.

In addition, we join with Disney/ABC in recommending that the FCC proceed to fully authorize nighttime AM IBOC services. Such nighttime AM IBOC operation is critical to the success of terrestrial digital broadcasting on the AM band and the continued viability of AM as a broadcast medium.

Crawford agrees with Susquehanna in its support of the NRSC-5 Standard, which is a result of long-term collaboration between industry engineering leaders and iBiquity Digital Corporation. This Standard has been developed and reviewed by the very best of our industry's brain trust. We can thus adopt the Standard with the assurance that every contingency has been considered and addressed. While far from ideal, NRSC-5 does in our view provide the very best solution given the limitations within which we must work to achieve an in-band/on-channel digital solution.

We further agree with Susquehanna in its belief that any potential additional first-adjacent channel nighttime interference which may be caused by IBOC operation will be minimal when compared to the tremendous improvements in quality and consistency that each station's primary coverage area. Indeed, we submit that if the long-standing emission limitations specified in 47 C.F.R. §73.44 are adequate to protect adjacent-channel stations from interference, no unacceptable adjacent-channel interference will result from properly-adjusted AM stations operating within this mask. Interference complaints within the protected contour should be addressed on a case-by-case basis with stations required to submit the results of properly-made occupied bandwidth measurements to show compliance. A procedure similar to that used by stations to deal with blanketing interference can be used with minimal Enforcement Bureau staff

involvement. We believe that interference complaints beyond the protected contour should not be considered.

Crawford disagrees with comments filed by Microsoft, Broadcast Signal Labs and Impulse Radio that seek delay of adoption of the NRSC-5 Standard until a CODEC standard is specified. While there are certain advantages to a single CODEC specification, adoption of the NRSC-5 Standard as submitted can proceed without significant penalty. As we stated above, the window during which IBOC technology can be successfully implemented in the terrestrial radio broadcast service is narrow; any delay would be detrimental – and perhaps ultimately fatal, particularly for AM.

In conclusion, Crawford supports the immediate adoption of the NRSC-5 Standard as submitted and the development of rules structured around the Standard. We further support the immediate authorization of nighttime AM IBOC operation with interference complaints to be addressed on a case-by-case basis.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'W.C. Alexander', written in a cursive style.

W.C. Alexander
Director of Engineering
Crawford Broadcasting Company

July 27, 2005