

BEFORE THE
Federal Communications Commission
WASHINGTON, DC 20554

In the Matter of:)
) MM Docket No. 99-325
In-Band / On-Channel Digital)
Radio Broadcasting Standard NRSC-5)

**JOINT REPLY COMMENTS OF ENTERCOM COMMUNICATIONS CORP.,
GREATER MEDIA, INC. AND INFINITY BROADCASTING CORPORATION**

Entercom Communications Corp., Greater Media, Inc. and Infinity Broadcasting Corporation (collectively, the “*Joint Commenters*”), by their attorneys, hereby submit joint reply comments in response to the Public Notice issued by the Federal Communications Commission’s (the “*FCC*” or the “*Commission*”) Media Bureau on June 16, 2005 (the “*Public Notice*”). The Public Notice seeks comment on the National Radio Systems Committee’s (“*NRSC*”) initial digital audio broadcast standard, “In-band/On-channel Digital Radio Broadcasting Standard NRSC-5” (the “*NRSC-5 Standard*”).

As previously noted, the Joint Commenters have long-supported iBiquity’s in-band, on-channel (“*IBOC*”) digital audio broadcasting (“*DAB*”) system as a method to further enhance terrestrial radio’s service to the public through higher quality audio programming and the provision of supplemental digital services. The Joint Commenters are pleased to join with other leaders in the broadcasting industry including the National Association of Broadcasters, National Public Radio, Susquehanna Radio, and The Walt Disney Company/ABC Inc. in urging the Commission to expeditiously adopt rules based on the NRSC-5 Standard as the regulatory standard governing DAB operation.

The NRSC-5 Standard was developed to provide a uniform standard so that the various entities associated with developing and introducing DAB can insure that their equipment will be interoperable with the other elements of the system while providing the necessary flexibility to allow for the future development of additional services and applications. The timely adoption of such rules based on this standard will provide the stability necessary to efficiently transition to digital radio broadcasting.

As noted by numerous other parties, adoption of a single DAB standard will provide transmitter and receiver manufacturers with the confidence they need that the equipment they build will be compatible with all digital radio nationwide. A uniform, NRSC-5 based standard will also provide assurance to broadcasters, including the Joint Commenters, that the significant resources they are investing to convert both AM and FM radio stations to IBOC capability will universally function with all broadcast transmitters and receivers. Perhaps most importantly, such a uniform standard will enhance public acceptance of this new technology, avoiding any preventable confusion that would result from multiple, incompatible digital broadcasting technologies. The only way to ensure the necessary compatibility among digital radio broadcasting's various elements is for the Commission to adopt a single transmission standard. The NRSC-5 Standard has been developed through an open and thorough process by recognized leaders in high-tech manufacturing, broadcasting and the government and should serve as the basis for the Commission's DAB rules.

The Joint Commenters acknowledge that concerns were raised that an audio codec was not included in the NRSC-5 Standard. This circumstance simply reflects the fact that iBiquity does not own all of the intellectual property associated with the iBiquity HD Radio codec and so was not in a position to disclose this proprietary information. As a result, the NRSC faced the

situation of being able to propose a DAB standard without an audio codec, or not being able to propose a DAB standard at all. The paramount importance of having a uniform, DAB standard, greatly outweighs any concern about the absence of a specified codec in the NRSC-5 Standard.

Commenters also advocated that the DAB standard allow for flexibility among broadcasters and equipment manufacturers for the use of alternative codecs in DAB related equipment. The Joint Commenters note that the idea of a codec identifier that would permit DAB receivers to recognize multiple codecs was only brought before the NRSC earlier this year and to the Joint Commenters's knowledge, no alternative codecs currently exist. The current standard permits the use of alternative codecs and although the concept was only recently raised, the NRSC's IBOC Standards Development Working Group (the "ISDWG"), which developed the NRSC-5 Standard, has already started reviewing the ability to incorporate a codec identifier and is expected to report on its findings in due time. Recognizing that the ISDWG's work is an ongoing process, the Joint Commenters strongly urge the Commission to not further delay action, but instead to adopt rules based on the NRSC-5 Standard developed and supported by the NRSC.

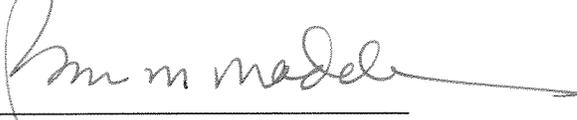
As was noted by other commenters, the NRSC-5 Standard contains a placeholder to include standards for data transmission in digital broadcasts. A draft of these standards has already been developed by the ISDWG and continued progress on development of these standards is expected. However, the Joint Commenters wish to reiterate that by their nature, these data transmission standards can be separately developed and subsequently incorporated into a DAB standard without consequence. As a result, the Commission is encouraged to adopt rules based on the NRSC-5 Standard as presented, with the intention of developing additional rules for data transmission standards once the ISDWG has presented its recommendations.

In addition to advocating the rapid adoption of rules based on the NRSC-5 Standard, the Joint Commenters observe that numerous other commenters called on the Commission to immediately adopt flexible rules authorizing multicasting, datacasting and AM nighttime service. These issues have been the subject of past notice and comment cycles that have been completed. Thus these issues are ripe for action. Therefore, the Joint Commenters reiterate their support for the rapid adoption of such rules so that broadcasters can begin to fully utilize the IBOC digital broadcasting potential.

For the foregoing reasons, the Joint Commenters call on the Commission to promptly adopt rules reflecting the NRSC-5 Standard for digital radio broadcasting.

Respectfully submitted,

Entercom Communications Corp.

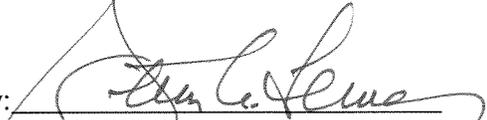
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Dated: August 17, 2005