

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

**In the Matter of** )  
 )  
 )  
**Digital Audio Broadcasting Systems and** ) **MM Docket No. 99-325**  
**Their Impact on the Terrestrial Radio** )  
**Additional Spectrum for** )  
  
**To: The Commission**

**COMMENTS**

The National Translator Association (“NTA”), by its attorneys, hereby comments on the Commission’s Public Notice, *Comment Sought on Joint Parties Request for FM Digital Power Increase and Associated Technical Studies*, DA 08-2340 (released October 23, 2008) [filing deadline extended by Public Notice DA 08-2553 (released November 24, 2008)] in the above-captioned proceeding.

NTA is an organization of owners and operators of radio and television translator stations throughout the United States, both commercial and noncommercial, which provide high-quality over-the-air radio and television service to underserved areas. NTA, since its inception, has been concerned with both the amount and the technical quality of radio and television programming that is available over the air.

The proposal currently under consideration in this proceeding would authorize stations to broadcast with an increased digital operating power of up to 10% of their authorized analog power. NTA does not object in principle to an

increase in the IBOC signal, so long as both the input signals and output signals--  
and hence the effective service areas--of FM translators are accorded appropriate  
interference protection, as set forth in greater detail in NTA's attached specific  
comments.

Respectfully submitted,

**NATIONAL TRANSLATOR  
ASSOCIATION**

By: /s/ George R. Borsari, Jr.  
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# NATIONAL TRANSLATOR ASSOCIATION

*OUR AIM – TO PROVIDE FM and TV SIGNALS in EVERY HOME*

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## COMMENTS OF THE NATIONAL TRANSLATOR ASSOCIATION

The National Translator Association (NTA) has many owners and operators of FM translators among its membership. The following comments are directed to the protection of both the input and output signals of FM translators

The NTA understands from the National Public Radio study that the IBOC signal at its present 1% level generally does not extend to the full area receiving a useable signal from the parent FM station. An increase in the level of the IBOC signal to 10% would improve the digital service to the public. It also concludes that a blanket increase in the level of the IBOC signal to 10% would result in considerable interference.

The NTA's concern in this matter is the protection of the actual service area of FM translators and also the universal protection of the input signal to FM translators.

It is not unusual for an FM translator to be dependent on an input signal from a fairly distant primary FM station in circumstances where there is a nearby adjacent channel primary station. Much effort has been put into mitigating the problem of receiving the desired signal while rejecting the adjacent channel interference.

If the Commission determines it is in the public interest to allow increases in the strength of the IBOC signals we believe such increases should each require an application and a granted construction permit and that each application should include the results of an engineering study demonstrating that no significant interference to other stations will result. Both the input signal and the service areas of FM translators should be included in the protected service.

Service area: The practical service area of FM translators extends down to a level

considerably below the protected contour values specified in §74.74.1204(a)(1)<sup>1</sup>. In order to fully protect the public protection should be required into areas where the actual predicted signal strength is 40 dB or greater. The calculations should be based on the Longley-Rice or other similar terrain dependent algorithm with the calculations following the procedures of OET bulletin 69 as used for TV calculations.

Input signal: Appropriate input signal protection should be provided using the notification procedure in use for microwave applications. The FCC microwave rules provides for protection of the input to a microwave receiver using a notification procedure. New IBOC applicants should similarly be required to notify present licensed users within a specified distance which is greater near the orientation direction of the FM translator receive antenna and lesser off axis (“keyhole concept”).

It is recommended that an application for an IBOC component greater than the present 1% coordinate with an FM translator licensee receiving an adjacent channel signal under the following circumstances:

- 1) If the IBOC applicant’s transmitter is within in  $\pm 25^\circ$  of the orientation of the FM translator receive antenna, coordination should be required if the separation is less than 100 km
- 2) If the IBOC applicant is more than  $25^\circ$  of the axis of the FM translator’s receiving antenna coordination should be requires if the distance is less than 70 km

An IBOC application should require a coordination exhibit similar to a microwave application listing the FM translators within the coordination distance and whether any negative response was received, An IBOC applicant should serve a copy of the final application on any FM translator licensee who responds negatively to the coordination request alerting the FM licensee of the need to protest the application.<sup>2</sup>

In the event a properly authorized IBOC addition to an FM station causes actual interference to either the input to an FM translator or to the reception of an FM translator as interference is defined in §74.1203(a)(3) the offending station should

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1. This section of the Rules specifies protected contours of 54 dB $\mu$  & 60 dB $\mu$  depending on the class of station. Not only are these values well above an actual usable signal they are based on regulatory contours which ignore actual terrain beyond 16 km.

2. As with microwave application coordination an FM translator license who fails to respond negatively to a coordination request can be deemed to have no objection to the proposal.

be required to take such measures as are required to correct the interference:

(74.1203(a)(3): The direct reception by the public of the off-the-air signals of any authorized broadcast station including TV Channel 6 stations , class D ( secondary), non-commercial Fm stations, **and previously authorized and operating FM translators** and FM booster stations . Interference will be considered to occur whenever reception of a regularly used signal is impaired . . . . . regardless of the quality of such reception, the strength of the signal so used or the channel on which the protected signal is transmitted. (Emphasis added)

We believe the public interest requires the FM translator protections outlined herein and the proposed requirements are a reasonable balance between maximizing the benefits of IBOC and protecting existing service.

Respectfully submitted

A handwritten signature in black ink that reads "B.W. St. Clair". The signature is written in a cursive, flowing style.

B. W.,. St. Clair

President

December 04, 2008