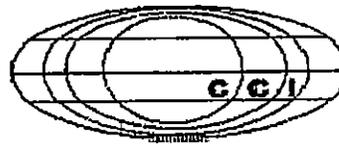


# CCI



Received & Inspected  
NOV 25 2008  
FCC Mail Room

## Carlson Communications, International

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NOV 26 2008  
February 5, 2008 6:38  
RECEIVED  
DIVISION

•KDYL AM  
Holiday Broadcasting Co  
South Salt Lake, UT

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

•KRJC FM  
Holiday Broadcasting of Elko  
Elko, NV

Dear Ms. Dortch,

•KTSN AM  
Humboldt Broadcasting, LLC  
Elko, NV

Holiday Broadcasting Company, Licensee KDYL-AM, Holiday Broadcasting Co. of Elko, Licensee KRJC-FM, Humboldt Broadcasting LLC, Licensee KTSN-AM, and Moab Communications, LLC Licensees KCYN-FM and KCPX AM submit these comments against the filing of parties concerning increased power levels with the IBOC Radio

•Elko Shopper Newspaper  
Holiday Broadcasting of Elko  
Elko, NV

We ask the F.C.C. to deny increased power HD Radio broadcasts for the following reasons:

•KCYN FM  
Moab Communications, LLC  
Moab, UT

- 1). Arguments presented to increase power are done by Ibiquty radio, whose engineers and owners have a vested interest. Something as important as this should be done by the F.C.C. itself.
- 2). Injection levels on FM IBOC digital already cause interference at the 1% level. An increase of ten times will cause even greater problems of interference.
- 3). Ibiquty has the exclusive patented rights, thus cutting out other systems such as the KAHN Cam-D and the Eureka 147 systems.
- 4). The National Association of Broadcasters echoes the Ibiquty line of the investors, and does not represent all licensees. This view of the NAB is anti-competitive. It is a monopoly forcing interference on other stations.
- 5). Adjacent channel interference on KSL-AM, Salt Lake City, creates a buzz two channels above and below the 1160 frequency. This is not in band/on channel, as originally proposed, but is usurping other station's reception with interference.
- 6). There are 800 million radios in listeners hands. Despite all the promotion of HD Ibiquty, sales have been a failure because listeners cannot tell any difference. There is no reason to make 800 million radios obsolete.

•KCPX AM  
Moab Communications, LLC  
Spanish Valley, Moab, UT

•Radio Force Promotions

•Youngevity Essential  
Life Sciences

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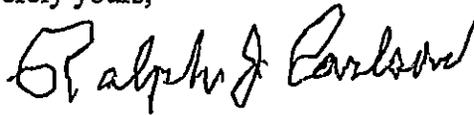
NOV 26 2008

MOAB SERVICES DIVISION

- 7.) This proposal goes against localism. It would put many small stations out of business, stations that communities depend upon. That is 80% of the country.
- 8.) Millions of people will lose their "favorite" station, (outside the protected 1MV/M contours), due to what the NAB and Ibiquity call tolerable interference.
- 9.) HD Radios are too expensive compared to analog radios. The signal bounces back and forth with analog with silence in between the change. The 8 second delay on IBOC has made it useless for sports broadcasts.
- 10.) Interference cases are already documented in letters to the F.C.C. The F.C.C. is so far behind on FM low power allocations that the increased power could jeopardize their service to communities.
- 11.) National Public Radio, in their test, concluded that the increase could result in interference to reception of first and second adjacent channel FMs.

In conclusion, allowing more than 1% injection is pushed by the big broadcasting groups, manufacturers, and Ibiquity at the expense of the intermediate and smaller broadcasters. All those who invested in early conversion to HD will now have to buy new equipment. It is a disservice to many listeners who also like to listen to distant signals.

Sincerely yours,



Ralph J. Carlson  
President  
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