

1. Whether the Bureau should defer consideration of the Joint Parties' requested power increase until the completion of and comment on the further NPR studies?

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I agree that the Bureau should defer any HD power increase until the completion of and commenting on the NPR studies. The NPR studies are the only studies that take into account the crowded NCE band, which the existing "real world" studies have not accounted for.

2. Whether the record in this proceeding, the real-world experience gained from over 1,400 FM stations operating for several years in the hybrid mode and the record of experimental authorizations at higher digital power levels warrant an increase in maximum digital operating power as proposed by the Joint Parties?

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No. The experimental authorizations only have shown that a certain class of station can work with higher HD power. They have NOT shown that higher HD power can work with no interference in more "crowded" situations involving FM translators, or the non-commercial band.

3. If the Commission does adopt a power increase, whether it should also establish standards to ensure the lack of interference to the analog signals of stations operating on first adjacent channels?

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Yes, any increase must be accompanied by a system of authorization designed to ensure minimal or no interference to adjacent channel stations. The increase should be optional, it should also be for increases UP TO 10dB injection (as in, not solely limited to only 20dB or 10dB, but instead be within that range).

It also should require any station wishing to increase power must submit a minor-change application to the FCC and demonstrate that

the proposed power increase will not cause interference. The FCC must act on the application before any increase is allowed.

4. Finally, if the Commission does adopt a power increase, whether it should also establish more explicit procedures to resolve digital-into-analog interference complaints?

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Yes, see also my reply to question 3, above.

Also, the FCC should allow for stations wishing to increase HD power that will cause interference to allow for negotiated settlements among affected parties that will pre-empt certain other rules if the end result is reduced overall interference.

For example, in the NCE band, if two stations are first-adjacent, and an HD power increase will cause unacceptable interference, and one station can change frequency and is willing to do so, but the change will cause third-adjacent overlap, then the FCC should authorize the move and waive the normal adjacent protection rules as overall the interference will be reduced.