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Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: MM Docket No. 99-325
Wisconsin Public Radio
Comments on Proposed HD Radio Digital Power Increase
June 23, 2009

Ms. Dortch:

Wisconsin Public Radio (WPR) is a three-network, thirty-one station public radio group. WPR has been a very early and active adopter of the new digital audio broadcasting technology "HD Radio" to bring new services to our listeners. Roughly half of the WPR AM and FM stations have been upgraded to offer hybrid analog/digital audio broadcasting.

The FCC recently issued a Public Notice soliciting a second round of comments on the proposed 10 dB across-the-board digital power increase for FM-HD stations. The Commission focused this request on several specific points. Taking these points in turn, Wisconsin Public Radio respectfully proposes the following:

1. The Media Bureau should defer consideration of the Joint Parties' requested digital power increase until the additional NPR Labs studies are completed, and opportunities for further industry comment have been provided. This process should only take a few more months, and will provide valuable insight into the digital power levels that can be safely accommodated in the FM band. Interference to existing FM station facilities must be prevented. This includes self-interference to each HD station's own analog main and subcarrier services as well as interference to first-adjacent stations in nearby communities.
2. The real-world experience of more than 1400 FM stations operating with HD signals confirms that an increase in FM digital power is needed. Wisconsin Public Radio has found that our FM stations have a reliable digital coverage only about two-thirds of their corresponding analog service areas. An increase is needed, but how much? The results of the further NPR Labs studies should provide the necessary information to answer that question. It is safe to say, however, that the proposed across-the-board increase in digital power from 1% of the analog carrier all the way to 10% would be unwise without testing and analysis.

3. If the Commission chooses to adopt an FM digital power increase, standards should be established based on these studies to prevent harmful self-interference to the analog signals of each host station as well as interference to other stations operating on first adjacent channels. Each FM station requesting a digital power increase should be tested against these standards to determine that station's maximum allowable digital power. The stations should then be permitted to increase digital power to any level between a minimum of 1% (20dBc) and the maximum determined by self- and first adjacent interference potentials.

Wisconsin Public Radio made an early and quite sizable investment in HD radio. A wide variety of HD upgrade techniques were utilized and the stations will likely face differing requirements for a power increase. In this complex environment it is vital that clear standards be established so that we can manage a power increase efficiently and effectively.

4. If the Commission adopts an FM digital power increase process which includes calculation of interference issues it will reduce or eliminate the need to resolve future digital-into-analog interference complaints.

In summary, Wisconsin Public Radio encourages the FCC to embrace the careful study of interference issues related to an FM digital power increase. Previous studies indicate that a blanket 10 dB HD Radio power increase would likely cause unacceptable interference and damage the existing audio broadcasting service. And public radio stations rely upon a very close relationship between stations and listeners for their existence. Degraded analog signal quality will result in the loss of listeners and harm the stations directly – thus our comments favor study and analysis over “shooting from the hip” on this important issue.

Thank you for your consideration of our views.



Steven B. Johnston
Director of Engineering and Operations
Wisconsin Public Radio