

FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
Digital Audio Broadcasting Systems) MM Docket No. 99-325
And Their Impact On the Terrestrial Radio)
Broadcast Service)

To: The Commission

Reply Comments of National Public Radio, Inc.

Pursuant to Section 1.415 of the Commission’s Rules, 47 C.F.R. § 1.415, National Public Radio, Inc. (“NPR”) hereby submits its Reply Comments in response to the comments on the Commission's Public Notice in the above-captioned proceeding regarding a joint request for voluntary in-band, on-channel ("IBOC") FM asymmetric sideband operation.¹

Based on the comments filed in response to the Public Notice, the record overwhelmingly supports the joint request to permit FM broadcast stations to operate IBOC asymmetric sidebands on a voluntary basis as proposed. As NPR and the other commenters pointed out, the authority requested provides a means of improving digital coverage without causing interference.² Like a

¹ Public Notice: Comment Sought on Request for FM Asymmetric Sideband Operation And Associated Technical Studies, MM Docket 99-325, rel. Nov. 1, 2011 [hereinafter "Public Notice"]. Unless otherwise indicated, all citations to comments are to comments filed in this proceeding in response to the Public Notice.

² Comments of National Public Radio, Inc. at 2-3 [hereinafter "NPR Comments"]. See also Comments of the Joint Parties at 5 ("The iBiquity and NPR Reports amply demonstrate that implementation of the Asymmetric Sideband Proposal will improve digital coverage while continuing to afford first adjacent stations adequate protection from harmful interference.");

station's implementation of IBOC itself, the decision to operate with asymmetric sidebands is left to the station's discretion. As a result, the joint request is consistent with the evolving digital transition of over-the-air radio broadcasting and serves the public interest in improved digital service while avoiding harmful interference to existing analog services.³

The lone opposition to the joint request was based not on the joint request itself, or even the prospect of asymmetrical sideband operation more generally, but on his disagreement with prior Commission actions in this proceeding,⁴ including the Bureau's Order generally authorizing FM IBOC stations to increase digital transmission power.⁵ This commenter's criticisms of past Commission actions are simply irrelevant to whether the Bureau should grant the now-pending joint request. Also irrelevant are comments directed at NPR itself, none of which challenge the testing conducted by NPR Labs with respect to asymmetrical sideband operation or otherwise.⁶

Comments of Nautel Maine at 2 ("This scenario would result in no harm, but benefit coverage by utilization of asymmetric power.").

³ See Comments of the National Association of Broadcasters at 3 ("Permitting this requested change for asymmetric digital operation would be entirely consistent with previous Commission decisions authorizing HD Radio digital technology and approving subsequent improvements to the digital radio service, such as dual antenna operation, extended hybrid digital service, multicast channel operation and increased digital power operation.").

⁴ See Comments of Jonathan E. Hardis, filed Dec. 19, 2011; Supplementary Comments of Jonathan E. Hardis, filed Jan. 3, 2012.

⁵ In the Matter of Digital Audio Broadcasting Systems And Their Impact on the Terrestrial Radio Broadcast Service, Order, 25 FCC Rcd. 1182 (2010) (Media Bureau).

⁶ Comments of Jonathan E. Hardis at 20-22. It should also come as no surprise that, as a non-profit membership organization, NPR seeks to further the interests of its member public radio licensees. In fact, NPR routinely discloses its representational role in its comment filings. See, e.g., NPR Comments at 1. That said, the commenter offers nothing but innuendo in questioning NPR's actions and crediting NPR for the independent decisions of the Corporation for Public Broadcasting and the National Telecommunications and Information Administration. See Comments of Jonathan E. Hardis at 20-21.

Indeed, there is no dispute over the technical basis for the joint request or the public interest benefits associated with granting the requested authorization.

Accordingly, the Commission should promptly authorize FM stations to implement asymmetric sideband operation on a voluntary basis and adopt the modest procedural modifications recommended in NPR's initial Comments to implement such operation.⁷

Respectfully submitted,

NATIONAL PUBLIC RADIO, INC.



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⁷ NPR Comments at 3-6.