



November 3, 2004

*Via Electronic Filing*

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

**Re: MM Docket No. 99-325**

Dear Ms. Dortch:

National Public Radio ("NPR") hereby submits a report relating to the iBiquity Digital ("iBiquity") HD Radio™ system entitled *Host Compatibility Measurements for the Extended Hybrid Mode of IBOC Digital Audio Broadcasting*. NPR, with support from the Corporation for Public Broadcasting ("CPB"), conducted the testing to assess the suitability of the iBiquity HD Radio Extended Hybrid Mode for the transmission of radio reading and other specialized services. Specifically, the testing measured the extent to which adding the Extended Hybrid Mode to IBOC DAB Primary Mode transmission affects stereo and SCA reception of the analog host.

As described in the Report, the testing indicates that, in the case of automotive, home stereo component and SCA receivers, the IBOC Extended Hybrid carriers caused little or no interference to the analog host. Shelf-type and portable receivers exhibit some increase, on the order of 3dB, which may be due to lower-cost tuner designs. Notwithstanding the noise increase among these latter categories of receivers, they tend to utilize less responsive speakers and audio amplifier circuits than component stereo and automotive systems, thereby audibly masking some of the noise increase.

Based on these results, we believe that Extended Hybrid Mode may be used to transmit radio reading services, and other specialized audience services. The Extended Hybrid Mode would facilitate the transition of these services from specially manufactured SCA receivers of historically inferior quality to mass market digital IBOC receivers. Accordingly, we urge the Commission to authorize stations to utilize the Extended Hybrid spectrum to offer radio reading and other specialized audience services.

We appreciate the opportunity to help further define the significant service attributes of the HD Radio system. NPR also wishes to thank CPB for providing the funding to conduct these studies in support of expanding public services to the American people.

Please direct any questions you may have to the undersigned at 202-513-2741.

Sincerely,

*Michael Riksen /s/*

Michael Riksen  
Vice President for Government Relations

Attachment