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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of	)	MM Docket No. 99-25
	)	
	)	RM-9208
Creation of a Low	)	RM-9242
Power Radio Service	)	

**Motion for Extension of Time**

Lucent Digital Radio (Lucent), by its attorneys and pursuant to Section 1.46 of the Commission's Rules, 47 C.F.R. § 1.46, hereby respectfully requests a 90-day extension of time to file comments in response to the above referenced Notice of Proposed Rule Making ("NPRM"). Comments currently are due on April 12, 1999. Grant of Lucent's request would result in comments being due on July 12, 1999.

Lucent is developing in-band on-channel (IBOC) digital radio technology that will permit AM and FM broadcasters to initiate digital transmissions and to migrate to an all-digital mode in a consumer-friendly manner. As discussed in the Commission's proceeding addressing digital broadcast technology, Lucent's systems should be fully developed and substantially field-tested by the end of 1999.<sup>1</sup> Lucent believes that digital radio transmission is critical for broadcasters to remain competitive and for the public to continue to have unfettered access to an array of advertiser-supported free, over-the-air radio programming in the 21<sup>st</sup> Century. Therefore at a minimum any digital broadcast system should meet the following objectives.

<sup>1</sup> Comments of Lucent Technologies, Inc., RM-9395, GEN Docket No. 90-357, In the Matter of Amendment of Part 73 of the Commission's Rules to Permit the Introduction of Digital Audio Broadcasting in the AM and FM Broadcast Services (submitted December 23, 1998).

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- Digital coverage equal to or better than that attained by existing stations, both during a transition when both analog and digital are broadcasting, and afterward when all signals are digital;
- Compatibility with analog systems during the analog-to-digital transition;
- Significantly superior audio quality;
- Increased spectrum efficiency;
- Enhanced emergency alert system (EAS) features; and
- Enabling a full range of additional features.

Fully and accurately assessing the impact of the Commission's proposals upon these objectives is critical in both this proceeding and the digital radio technical proceeding. In the NPRM issued on low power radio, the Commission and separately each of the Commissioners expressly recognized the importance of assessing the effect that the low power proposals, if adopted, would have on the digital systems being developed and tested to replace analog systems.<sup>2</sup> However, existing Lucent technical evaluations are based on the current FCC rules and technical requirements. Evaluating the effects of the Commission's new multiple alternative proposals is complex and time consuming.

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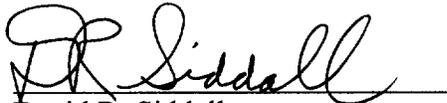
<sup>2</sup> See Creation of a Low Power Radio Service, Notice of Proposed Rulemaking, MM Docket 99-25 (FCC 99-6, released February 3, 1999) at paras. 47-49, App. C; See also Joint Statement of Chairman Kennard and Commissioner Tristani ("... we will do our part to make sure that local radio is not left on the sidelines of the digital revolution."); Statement of Commissioner Ness ("IBOC technology appears to be almost ready for commercial application and should not be undermined or compromised by any action we take on low power FM."); Separate Statement of Commissioner Powell ("I would be concerned if authorizing some or all of these low power radio services would make in band on channel conversion to digital radio unworkable for existing terrestrial services. Again, I encourage commenters to focus specifically on this issue, so that we can make a fully informed judgment."); and Dissenting Statement of Commissioner Furchtgott-Roth ("The creation of low power radio by elimination of current interference rules may also have a similar effect on the FM radio band itself by hindering the development of new, advanced services such as in-band, on-channel digital radio.").

Submission to the Commission of reliable and accurate information based upon analysis of the Commission's proposals and IBOC digital transmission systems is of great importance to the future of broadcasting. Lucent desires to respond fully and factually to the request to assess the effect that the Commission's proposals will have upon digital implementation, but constructing meaningful and technically valid assessments requires substantial resources and time due to the complexity of the issues and the multiple nature of the Commission's proposals in the NPRM.

Lucent therefore respectfully requests a three month extension of the comment deadline. Grant of this request would enable Lucent to more fully analyze the Commission's proposals and to submit the results to the Commission. Lucent believes that for the above reasons its request is justified and in the public interest.

Respectfully Submitted,

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