

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

**In the Matter of
Creation of a Low
Power Radio Service**

MM Docket 99-25

RM-9208

RM-9242

Digital Radio Express, Inc. (DRE) a California Corporation developing AM/FM In Band-OnChannel (IBOC) Digital Audio Broadcast (DAB) technology wishes to register its support for the MOTION FOR EXTENSION OF TIME OF COMMENT AND REPLY COMMENT DEADLINES as requested by the National Association of Broadcasters et al dated 5 March, 1999.

Although DRE supports the request for extension of time, as outlined, DRE believes the Commission would find DRE's IBOC DAB field test data valuable in this case. However, DRE will require additional time to provide complete data that includes the impact of LPFM on its IBOC system. DRE believes it could provide extensive field test data before the end of Q4 of 1999.

With regards to DRE field testing of its AM/FM IBOC DAB system, DRE supports the NRSC approach of defining a test plan and procedure for IBOC DAB testing and has been an active participant in this process. DRE would commence laboratory and field testing according to the NRSC defined procedures. DRE owns and operates a fully equipped van which is capable of precision testing in a field environment and has been used for such purposes in the past. Based on previous testing experience, DRE would commence testing in the San Francisco area which is a relatively harsh environment. Using this as a baseline other select areas would be chosen to expand the data base. We anticipate 5 to 10 major market areas would be tested so as to include the numerous environments representing the radio coverage profile of the U.S.

The field testing would follow the guidelines as outlined above (for details refer to NRSC subcommittee IBOC test groups test guidelines in process), but in addition would include a test procedure to determine the impact of LPFM on the IBOC performance. The DRE IBOC DAB system is in a very advanced state of development and current test results are very positive; however, it is DRE's opinion that before LPFM service is authorized its impact on IBOC DAB must be investigated thoroughly to insure that IBOC DAB, now nearing successful demonstration, is not jeopardized. The fundamental laws of physics cannot be denied; additional energy in the spectrum will create some measurable interference. Just as with an IBOC system where some deleterious effects of the additional energy within the spectrum will be measurable, likewise LPFM will have some impact accordingly. However, with proper design these effects can be minimized such that there is significant net advantage overall to the listener and the industry at large. Only with proper data can the impact of LPFM be determined and therefore it is critical that the Commission allows sufficient time accordingly. DRE requests that the Commission extend the comment period deadline to December 1, 1999.

Respectfully submitted,

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Dated: March 17,1999