

April 4, 2000

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, DC 20554

Re: MM Docket No. 99-25
Ex Parte Notice

Dear Ms. Salas:

Pursuant to Section 1.200, et seq., of the Commission's Rules, National Public Radio, Inc. ("NPR") hereby notifies the Commission of the following *ex parte* presentations regarding the above-referenced proceeding. A copy of this notice is being filed electronically.

On Monday, April 3, 2000 and Tuesday, April 4, 2000, representatives of NPR met with Commission staff to discuss the Commission's Report and Order in the above referenced proceeding.

During the course of the meetings, NPR expressed concerns regarding the Report and Order, including interference to existing public radio services, including radio reading services for the print-impaired stations, whether provided by full facilities or translator or booster facilities; the need to assure existing and future translator service, the need for a swift, fair process to adjudicate cases of interference; and the need to anticipate and protect the transition to Digital Audio Broadcasting (DAB). At the Tuesday, April 4, 2000 meeting, NPR provided the attached test methodology to measure the susceptibility SCA receivers to measure interference

Please direct any questions you may have regarding this matter to the undersigned.

Sincerely,

Gregory A. Lewis
Associate General Counsel

April 3, 2000 Rev X

**SUBCARRIER RECEIVER SUSCEPTIBILITY TO INTERFERENCE
TEST PROCEDURES
(Preliminary Test)**

Test Group	Test	Test Description Notes: For the objective tests the desired signal's main program channel will be modulated with 1 kHz tone, 10 % 67 kHz analog 5 kHz deviation, and 10% 92 kHz analog 5 kHz deviation.
A Calibration and general procedures	1. Calibration	<ol style="list-style-type: none">1. Modulation monitors calibration (Bessel null)2. Subcarrier injection procedure3. Undesired signal modulation (CPN) setup
	2. Subcarrier receiver characterization	<ol style="list-style-type: none">1. Set standard audio output level2. Find input overload3. Plot S/N vs RF level
	3. Test bed calibration	<ol style="list-style-type: none">1. Complete test-bed will be calibrated prior to testing or as needed.
	4. Audio noise measurements	<ol style="list-style-type: none">1. All noise measurements will be RMS

April 3, 2000 Rev. X

**SUBCARRIER RECEIVER SUSCEPTIBILITY TO INTERFERENCE
TEST PROCEDURES
(Preliminary Test)**

Test Group	Test	<p style="text-align: center;">TEST DESCRIPTION</p> <p>Notes:</p> <ol style="list-style-type: none"> 1. The analog FM subcarriers will use 150 usec pre-emphasis with 5 kHz FM deviation. 2. The desired modulation will be set for 110% with a total of 20% subcarrier injection. 3. For the interference two receivers will be selected. from the group characterized in A.4. 4. The desired host program channel will be modulated with 1 kHz tone, 10 % 67 kHz analog 5 kHz deviation, and 10% 92 kHz analog 5 kHz deviation.
B FM to FM subcarrier interference without multipath	1. Co-channel	<ol style="list-style-type: none"> 1. The undesired co-channel transmitter will be modulated 100% with CPN and pilot. 2. The subcarrier audio S/N and RDS performance will be measured with the D/U set at 20dB, 40 dB.
	2. First adjacent	<ol style="list-style-type: none"> 1. The undesired upper 1st adjacent signal will be modulated 100 % with CPN and pilot. 2. The two analog subcarriers' audio WQP S/N will be measured with the D/U set at 6dB, 16 dB. 3. The test in step 2 will be repeated with the undesired transmitter on the lower 1st adjacent channel.
	3 Second adjacent	<ol style="list-style-type: none"> 1. The undesired upper 2nd adjacent signal will be modulated 100% with CPN and pilot. 2. The two analog subcarriers' audio WQP S/N will be measured with the D/U set at -20dB, -30 dB, 40 dB. 3. The test in step 2 will be repeated with the undesired transmitter set on the lower 2nd adjacent channel.
	4 Third adjacent	<ol style="list-style-type: none"> 1. The undesired upper 3rd adjacent signal will be modulated 100% with CPN and pilot. 2. The two analog subcarriers' audio WQP S/N will be measured with the D/U set at -40 dB and -30 dB. 3. The test in step 2 will be repeated with the undesired signal set on the lower 3rd adjacent channel.