

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of )  
 )  
The MITRE Corporation's Technical Report, ) )  
"Experimental Measurements of the ) MM Docket No. 99-25  
Third-Adjacent-Channel Impacts of )  
Low-Power FM Stations" )  
 )

To: The Commission

**MOTION FOR EXTENSION OF TIME**

Pursuant to Section 1.46 of the Commission's Rules, 47 C.F.R. § 1.46, National Public Radio, Inc. ("NPR")<sup>1</sup> and the International Association of Audio Information Services ("IAAIS")<sup>2</sup> hereby respectfully request a 90-day extension of the September 12, 2003 deadline by which comments may be filed regarding the MITRE Corporation's Report entitled "Experimental Measurements of the Third-Adjacent-Channel Impacts of Low-Power FM Stations" (the "Report").<sup>3</sup> As set forth below, NPR and IAAIS believe there is good cause for the Commission to provide an extension of the comment filing deadline. Accordingly, NPR and IAAIS respectfully request an extension of the comment filing deadline to December 10, 2003.

The Report describes a series of experimental field studies of the potential radio-

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<sup>1</sup> NPR is a nonprofit membership corporation that produces, acquires, and distributes news, information, and cultural programming for broadcast by more than 700 affiliated noncommercial educational ("NCE") stations nationwide. In addition, NPR provides representation and other services to its Member stations and operates the Public Radio Satellite Interconnection System.

<sup>2</sup> IAAIS is an all-volunteer membership organization representing more than 120 information access services that turn text into speech for the blind, visually impaired, or otherwise print disabled populations.

frequency ("RF") interference that 10 watt and 100 watt low-power FM ("LPFM") stations may cause to nearby full power and translator stations operating on third adjacent channels. The Report, totaling 732 pages, includes a Final Report which "contains theoretical analysis, conclusions, and recommendations to the Commission."<sup>4</sup> The Report also includes three annexes setting forth the test plan and procedures employed by the MITRE Corporation and its subcontractor, Comsearch, as well as the data generated in the course of conducting the tests.

The MITRE Corporation and Comsearch have undertaken a difficult and complex task of measuring RF interference, the occurrence and severity of which depend on a variety of environmental factors as well as radio receiver performance characteristics, and identifying a particular interfering transmitter among a variety of potential sources of interference. The test methodology comprised (1) 6 primary transmitter test sites, 8 receiver locations per site, a total of 6 receivers, including 1 radio reading service receiver, 3 LPFM power levels, and 3 programming types; (2) a translator test site, which utilized 1 translator and 1 LPFM transmitter, 2 receiving locations, and 8 LPFM power levels; and (3) laboratory testing of the iBiquity Digital Corporation's IBOC system.<sup>5</sup> The testing generated a large volume of data from which the MITRE Corporation has derived quantitative results and drawn qualitative conclusions.

NPR and IAAIS have a particular interest in the testing of potential interference to the reception of radio services for the print-disabled offered via full power and translator stations. NPR members operate many full power and translator stations, and many offer radio reading services provided by IAAIS members. As a result, NPR's and IAAIS's respective members have

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<sup>3</sup> See Public Notice, MM Docket No. 99-25, DA 03-2277, July 11, 2003.

<sup>4</sup> Public Notice at 1.

<sup>5</sup> See Report at I-5 to I-14

practical experience in offering radio reading services in difficult RF environments. NPR and IAAIS also previously examined the issue of RF interference to the reception of radio reading services in this proceeding, and NPR and IAAIS collaborated in the testing of the compatibility between analog subcarrier frequencies, which radio reading services utilize, and iBiquity Digital Corporation's then-proposed FM in-band, on-channel ("IBOC") digital audio broadcast system.<sup>6</sup>

NPR and IAAIS each operate with limited resources. IAAIS, in particular, is strictly a volunteer run organization, whose officers and board members work at locally based reading services while also acting as IAAIS staff. The result of the present inquiry could affect millions of blind or visually impaired citizens and their access to "life-line" sources of information. The additional time requested is thus necessary to permit NPR and IAAIS to devote appropriate resources to assessing the Report while meeting their other operational responsibilities.

More generally, a thorough examination of the Report is essential to determining whether LPFM stations should be authorized to operate on 3rd adjacent channels to full power FM stations and to FM translator stations, consistent with sound engineering principles and the FM broadcast RF environment. Congress reinstated the third-adjacent channel spacing requirements for LPFM stations and mandated the field tests that are the subject of the present inquiry because of concerns over the potential for interference by LPFM stations to full power and translator stations operating on third-adjacent channels.<sup>7</sup> Congress is likely to accord significant weight to the well-founded conclusions of the Report in deciding whether further Congressional action is warranted. All interested parties should therefore have a full opportunity to assess and,

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<sup>6</sup> See "Further Report on Analog SCA Compatibility with iBiquity Digital's FM-IBOC System" (March 2002), filed in Digital Audio Broadcasting Systems and Their Impact on the Terrestrial Radio Broadcast Service, MM Docket No. 99-325, May 24, 2002.

<sup>7</sup> See D.C. Appropriations - FY 2001, Pub. L. No. 106-553, § 632, 114 Stat. 2762, 2762A-

resources permitting, test the validity of the Report and its conclusions.

Based on the foregoing, the extension of time requested is warranted to permit a thorough analysis of the test plan and procedures, which were not subject to prior public review or comment, the test data, and the related Commission policy and rule changes that the MITRE Corporation has proposed. Accordingly, NPR and IAAIS respectfully request the Commission to extend the comment deadline to December 10, 2003.

Respectfully submitted,

NATIONAL PUBLIC RADIO, INC.

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