

NATIONAL RADIO SYSTEMS COMMITTEE

May 18, 2005

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

Re: MM 99-325

Dear Ms. Dortch:

In the *First Report and Order* in MM Docket No. 99-325 the Commission sought National Radio Systems Committee (NRSC) assistance in the development of an IBOC digital radio standard.¹ As the co-sponsors of the NRSC, the Consumer Electronics Association (CEA)² and the National Association of Broadcasters (NAB)³ today submit the NRSC In-Band/On-Channel (IBOC) Digital Radio Broadcasting Standard to the Commission for consideration.

This standard, also known as NRSC-5, was approved by the NRSC's DAB Subcommittee on April 16, 2005. The standard is based on iBiquity Digital Corporation's IBOC digital radio technology. In the iBiquity system, audio source coding and compression are handled by iBiquity's HD codec. NRSC-5 does not include specifications for audio source coding and compression. iBiquity has committed to license on reasonable terms and conditions that are demonstrably free of any unfair discrimination all patents necessary to implement NRSC-5, either with or without the HD codec. It also is possible within the NRSC-5 standard to use audio source coding and compression schemes other than iBiquity's HD codec.

Respectfully submitted,

CONSUMER ELECTRONICS
ASSOCIATION



Michael D. Petricone, Esq.
Vice President, Technology Policy
Julie M. Kearney, Esq.
Senior Director and Regulatory Counsel

NATIONAL ASSOCIATION OF
BROADCASTERS



Valerie Schulte, Esq.
Deputy General Counsel
Lynn D. Claudy
Senior VP, Science & Technology

¹ *First Report and Order*, MM Docket No. 99-325, released October 11, 2002, at para. 44.

² The Consumer Electronics Association is the principal U.S. trade association of the consumer electronics and information technologies industries.

³ NAB is a nonprofit, incorporated association that serves and represents America's radio and television broadcast stations.