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October 20, 2004

Via Electronic Filing

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

Re: MM Docket No. 99-325

Dear Ms. Dortch:

National Public Radio ("NPR") hereby submits two reports relating to the iBiquity Digital ("iBiquity") HD Radio™ system: (1) Perceptual Tests of Biquity's HD Coder At Multiple Bit Rates and (2) Report on Perceptual Tests of Low- and Very Low-Bit Rate Codecs. As we advised the Commission in our Comments in response to the Further Notice of Proposed Rulemaking in the above referenced proceeding, NPR, with support from the Corporation for Public Broadcasting ("CPB"), conducted the testing to assess iBiquity's HD Coder sound quality at different bit rates as well as the suitability of the iBiquity HD Radio Extended Hybrid Mode for the transmission of radio reading services.

Report on Perceptual Tests of IBiquity's HD Coder At Multiple Bit Rates

The multiple bit rate testing examined the extent to which general public listeners could detect quality differences in the HD coder at particular bit rates. As we previously reported, NPR's initial Tomorrow Radio® Project testing was performed with channel bit rate allocations of 64 kbps Main and 32 kbps Supplemental. See Tomorrow Radio Field Testing in the Washington, D.C., New York City, San Francisco, and Los Angeles (Long Beach) Radio Markets, MM Docket No. 99-325, at 1, filed Mar. 10, 2004. The new testing indicates that 48 kbps is perceived by most listeners as providing equal sound quality to the maximum rate of 96 kbps. Just as importantly, the testing demonstrates that the optimal bit rate allocation varies according to specific categories of programming, including voice and different genres of music.

Taken together, the testing supports adoption of a flexible framework in the IBOC DAB service rules. Specifically, we believe the Commission should permit individual stations to make audio bit rate allocations based on local program service factors rather than specifying the amount of capacity stations must allocate to any given service.

Report on Perceptual Tests of Low- and Very Low-Bit Rate Codecs

The Report on Perceptual Tests of Low- and Very Low-Bit Rate Codecs results from testing NPR commissioned in cooperation with the International Association of Audio Information Services and iBiquity to assess the suitability of the Extended Hybrid digital spectrum for radio reading service transmission. Specifically, the testing measured subjective qualitative differences among the latest digital audio codecs that may be used for radio reading services.

As described in greater detail in the Report, improved quality was achieved with readily available codecs compared to existing analog SCA technologies, both within a single Extended Hybrid partition and within two, of the four available, partitions. Based on these results, we believe radio reading services, and other specialized audience services, will be a practical service option via Extended Hybrid Mode. This would allow listeners who rely on these services to purchase commonly available mass market receivers, ultimately freeing these services from reliance on specially manufactured SCA receivers, which historically have offered inferior quality service.

We appreciate the opportunity to help further define the significant service attributes of the HD Radio system. NPR also wishes to thank CPB for providing the funding to conduct these studies in support of expanding public services to the American people.

In closing, and given significant interest within public radio to begin offering expanded public services, we again urge the Commission to authorize as soon as possible multicasting utilizing the iBiquity HD system as NPR advocated in its recently filed Comments and Reply Comments in the above-referenced proceeding.

Please direct any questions you may have to the undersigned at 202-513-2741.

Sincerely,

Michael Riksen /s/

Michael Riksen
Vice President for Government Relations