



Canadian Association of Broadcasters
L'Association canadienne des radiodiffuseurs

August 4, 2004

Ms. Suzanne Hurtubise
Deputy Minister
Industry Canada
235 Queen Street
Ottawa, Ontario
K1A 0H5

Subject: Implementation of Hybrid FM and AM Digital IBOC Signals in the United States

Dear Ms. Hurtubise:

The Canadian Broadcasting Corporation and the Canadian Association of Broadcasters would like to bring to your attention an important matter that may have adverse effects on all Canadian radio broadcasters. Industry Canada's counterpart in the United States, the FCC, has authorized its FM and AM broadcast stations to implement digital radio services using an IBOC¹ hybrid signal. AM IBOC operations are currently confined to daytime hours only; however, a public consultation is currently underway in the United States to investigate whether night-time operations should also be authorized.

At this point in time, the potential adverse effect of the transmission of FM IBOC signals is still under study; however, it is very likely that the transmission of AM IBOC signals from the United States will be harmful to the reception of Canadian AM signals over Canadian territory, more particularly at night. As well, it is our opinion that transmission of IBOC signals, either on the AM or FM band, is not currently permitted by the international and bi-lateral agreements that both Canada and the United States have ratified.

.../2

¹ IBOC : In-Band On-Channel

Should the FCC authorize the transmission of night-time AM IBOC signals, there is a high risk that this will create unacceptable interference to the reception of existing Canadian AM signals in many areas of Canada. The CBC transmits its Radio One and *Première Chaîne* signals on both the AM and FM bands. The AM transmitters are of particular importance in the Western and Atlantic provinces of Canada where single transmitters cover extensive areas that may be province-wide. Interference to these signals would jeopardize the integrity of the Corporation's radio networks services and its ability to fulfill its mandate and bring CBC programming to the largest possible number of Canadians.

Many private AM radio stations also provide local and regional services that cover wide areas. Some are the sole means of obtaining very local programming and information, especially in times of emergency.

While the FCC apparently recognizes that such international issues are "matters that are important to consider"² it fails to give it the importance it deserves by then stating that "these are not appropriate subjects for a rulemaking at this stage of the DAB conversion process"³. The FCC further makes mention that "it is anticipated that hybrid [IBOC] operation would also conform to the allocation standards contained in our international agreements governing AM and FM stations"⁴, while not offering any demonstration that this is the case.

We disagree with the FCC's optimistic position. It is clear to us that:

- a) The IBOC operations the FCC is already authorizing do not conform with the international and bi-lateral agreements between Canada and the United States;
- b) Night-time AM IBOC operations in the United States will be detrimental to Canadian AM signals;
- c) Insufficient technical information is available with regards to the effect of AM IBOC day-time operations and FM IBOC operations on Canadian AM and FM stations;
- d) Considering a) by itself makes international issues an appropriate subject to be discussed by Industry Canada with the FCC, and the fact that interference to Canadian signals is expected, emphasizes the necessity for Industry Canada to make the concerns of Canadian radio broadcasters known to the FCC as soon as possible.

Our respective engineering personnel have already voiced their concerns in this regard at the last meeting of Industry Canada's Broadcast Technical Advisory Committee. Also at that meeting, two supporting documents (B-TAC 04-04, & B-TAC 04-05) outlining the impact of AM IBOC transmission and its non-compliance with international and bi-lateral agreements were tabled and discussed⁵. Our immediate concern is the potential interference of AM IBOC at night-time on

.../3

² FNPRM paragraph 1

³ FNPRM paragraph 1

⁴ FNPRM paragraph 71

⁵ Document TAC-04xx and TAC-04-yy

existing AM stations operating according the current transmission standards. As it can be seen, in the "Final Acts of the Regional Administrative MF Broadcasting Conference – Region 2 (referenced as the "Rio Agreement" signed in 1981 – See Annex 2, Appendix 5, Paragraph 8), there are no provisions for protection against 1st and 2nd adjacent channel AM skywave interference, which is what AM IBOC night-time will cause.

Considering the importance of this issue, we feel that it is necessary for us to stress again the necessity for Industry Canada to notify the FCC that the authorization of AM IBOC transmissions, especially at night, will very likely result in harmful interference to Canadian signals. We also consider that it is important to emphasize that such transmissions are not in accordance with the current international and bi-lateral agreements and, therefore, should not be authorized by the FCC unless and until these agreements are amended.

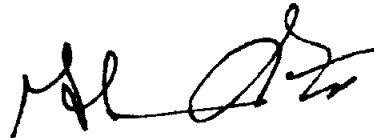
Should the Department desire our participation in tests and/or committee work to help establish both data and action plans in this regard, we remain available to assist in any way we can.

Sincerely,



Robert Rabinovitch
President and CEO
CBC/Radio-Canada

Yours sincerely,



Glenn O'Farrell
President and CEO
Canadian Association of Broadcasters (CAB)

cc: Michael Binder, Assistant Deputy Minister
Spectrum, Information Technologies and Telecommunications
Industry Canada

Vassilios Mimis
Chairman, B-TAC & Director – Broadcast, Multimedia Planning and Technical Policy
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