



Albert Shuldiner  
Senior VP & General Counsel

May 17, 2013

Hon. Julius Genachowski, Chairman  
Hon. Robert McDowell, Commissioner  
Hon. Mignon Clyburn, Commissioner  
Hon. Ajit Pai, Commissioner  
Hon. Jessica Rosenworcel, Commissioner  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

**RE: Waiver Joint Request of Hancock Communications, Inc., the licensee of  
WTCJ(AM), Tell City, Indiana, and WAY Media, Inc., FCC File Number:  
BPFT-20121116ALE**

Dear Chairman Genachowski and Commissioners:

On behalf of iBiquity Digital Corporation (“iBiquity”), I am writing to express our support for the above-referenced waiver request and to encourage the Commission to provide greater flexibility for AM stations that seek to obtain access to FM translators. This waiver request provides the Commission with an immediate opportunity to address the need of many AM broadcasters to find creative ways to enhance their ability to serve their listeners.

iBiquity is the inventor of the HD Radio™ system for converting both AM and FM stations to digital broadcasts. Since its creation in 1998, iBiquity has been dedicated to the improvement of AM and FM radio, and iBiquity has invested hundreds of millions of dollars in the development and commercialization of the HD Radio system. Currently, more than 2,200 stations have converted to digital broadcasts, including 260 AM stations, and over 12 million digital receivers have been produced. Although the HD Radio system’s enhancements for FM broadcasting, such as multicast channels and datacasting services, receive the most public attention, the AM HD Radio system also offers crucial benefits for AM broadcasters. The digital signal allows AM broadcasters to offer FM quality sound and eliminates many of the impairments associated with analog AM. Moreover, the HD Radio all digital mode of operation will eliminate the overlap between adjacent channel AM signals, thereby eliminating one of the biggest sources of impairments AM broadcasters confront. As the Commission is aware, however, the transition to digital broadcasting will take time, and it may be many years before the majority of AM broadcasters are able to take advantage of the benefits of the HD Radio system. The current economic challenges confronting AM broadcasters have impeded their ability to make capital investments in HD Radio equipment, further delaying their access to this means of upgrading AM broadcasting.

Although iBiquity believes conversion to digital broadcasting offers the best long term prospect for AM broadcasters, iBiquity recognizes this transition will take many years, and AM broadcasters cannot wait that long. The explosive growth in the use of electronic devices over the past several decades and the increase in wireless communications have significantly impaired AM broadcasts. There has been a steady erosion of AM listeners and the economic viability of many stations has been called into question. iBiquity urges the Commission to take immediate steps to assist AM stations.

The current waiver request provides an important opportunity for the Commission to assist AM broadcasters by enhancing the ability of AM broadcasters to use FM translators to reach their audience. As the waiver application itself notes, providing the requested regulatory flexibility will afford AM broadcasters immediate relief without requiring extensive restructuring of the Commission's regulations and will not saddle AM broadcasters with additional operating expense. iBiquity encourages the Commission to grant this waiver request to allow WTCJ(AM) to better meet its audience's needs and to look for similar opportunities to assist other AM broadcasters.

Respectfully submitted,

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