



November 21, 2008

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

Re: MM Docket No. 99-325

Dear Ms. Dortch:

On behalf of Ford Motor Company, I am writing to express Ford Motor Company's support for the pending proposal to increase the authorized digital power for FM digital radio stations. On October 23, 2008, the FCC's Media Bureau released a public notice seeking comment on the proposal by a group of broadcasters and interested parties to increase the authorized power for FM digital broadcasts. That public notice also seeks comment on technical studies conducted by iBiquity Digital Corporation and National Public Radio concerning the feasibility of implementing the power increase.

Ford Motor Company is a manufacturer of automobiles in and for the U.S. market. The vast majority of vehicles sold in the United States include AM/FM radio receivers, and we continue to perceive that as an important feature for car consumers.

Ford Motor Company offers HD Radio as a dealer installed option on a majority of our product lines, and hopes to offer HD radio as an original equipment installation in the near future.

In Ford Motor Company's experience with the technology, HD Radio technology can offer important benefits to consumers in terms of upgraded audio and new services. In particular, the introduction of multicast or HD2 channels offers consumers a new range of audio services not supported by analog service. Ford Motor Company remains concerned, however, that these benefits of HD Radio technology will not be accepted by the public unless HD Radio technology is able to replicate analog coverage in a greater number of cases. Although there are many stations that enjoy excellent digital coverage, there are a number of stations that are not able to replicate their analog coverage with the current configuration of the HD Radio system. These coverage problems are particularly problematic in a car environment. Mobile reception is inherently more susceptible to multipath interference and other impairments that can vary considerable in very short time frames as a car drives into and out of areas of interference. Moreover, tunnels,

underpasses and parking garages are just some of the physical structures that can provide reception challenges for car radios.

The Joint Parties proposal pending before the FCC seeks to address concerns about HD Radio coverage by allowing stations to increase digital power by up to 10 dB. Ford Motor Company supports this proposal. The tests iBiquity Digital conducted demonstrate a 10 dB power increase will deliver a more complete replication of digital coverage in a variety of terrain environments. The tests also confirm the higher power will increase building penetration. In the case of car listeners, this means, obstructions such as garages and underpasses will provide less of an impediment to continued reception. These tests confirm both the improved coverage and building penetration from the increased transmission power level and also the viability of increasing power without causing undue interference to adjacent channel stations. They also demonstrate that there will be limited impact on adjacent channel stations in the vast majority of cases.

Ford Motor Company believes a power increase would serve the public interest by improving the ability of the public to enjoy the benefits of HD Radio technology. The record before the Commission confirms that these enhanced benefits can be achieved without causing unacceptable levels of interference to existing analog radio service. As such, Ford Motor Company encourages the FCC to authorize FM digital stations to operate at the proposed power level to offer consumers greater access to digital radio technology.

Respectfully submitted,

Charles R. Elkins
AM/FM Technical Specialist
Ford Motor Company