

**MM Docket No. 99-325**  
**“FCC Proposed HD Radio 10 Percent Power Increase”**

The University Station Alliance (USA) headquartered at 1017 W Brooke Hollow Ct, Stillwater, OK, Executive Director Craig Beeby, is a grassroots non-profit 501 (c) (3) representing noncommercial public radio stations licensed to universities, colleges, and state agencies. One hundred and six (106) of these across the country are affiliated or actively involved with the USA. The USA’s comments on the **FCC HD Radio 10 Percent Power Increase (MM Docket No. 99-325)** are as follows:

The USA supports National Public Radios' (NPR) position on the proposed 10 dB power increase. Like NPR, the USA generally supports increasing HD transmission power provided it is based on a managed regulatory policy (spacing rules would apply rather than a free for all without regard to consequences to analog neighbors). We believe this approach is essential to avoid harmful interference to analog radio services, which remains the predominate connection between the public and public radio programming. An across-the-board increase is a flawed approach because it requires an unnecessary balancing between improved coverage and increased interference that fails to account for each station's 1st adjacent distance separations.