

December 10, 2008

The Honorable Meredith Attwell Baker
Acting Assistant Secretary for Communications and Information
National Telecommunications and Information Administration
U.S. Department of Commerce

Dear Ms. Baker:

The Broadcasting Board of Governors (BBG) is responding to your letter requesting our Agency's input for the FY 2008 Progress Report on the *President's Spectrum Policy Initiative*. Our enclosed response addresses accomplishments made between October 1, 2007 and September 30, 2008. It follows the suggested template and checklist, addressing only those elements as applicable to the BBG.

If you or any member of your staff require any additional information or clarifications, please feel free to contact Mr. Vincent Nowicki, Director of Engineering and Technical Operations, at (202) 382-7300.

Sincerely,

Jeffrey N. Trimble Executive Director

Enclosure

Broadcasting Board of Governors' Input for FY 2008 Progress Report on the President's Spectrum Policy Initiative

1. Agency accomplishments toward implementing the June 2004 spectrum reports:

BBG continues to be a world leader in the international broadcasting of high frequency (HF) transmissions. In spite of reductions, BBG's radio broadcasts, which are vital to the U.S. public diplomacy mission, remain at significant levels compared to rival broadcasters.

As a result of the BBG's changing global mission to meet current U.S. government broadcast requirements, along with realigned resources and changes in technology, the International Broadcasting Bureau (IBB) ceased broadcasting from its Morocco shortwave transmitting station at the end of March 2008. As technology changes and audience preferences change, we have downsized and realigned the IBB transmission network. Consequently, we have placed broadcasts formerly from this site onto as many of our remaining BBG HF transmitting sites as were cost effective and practical to use. Other HF programming was placed on leased facilities overseas or exchanged for reciprocal broadcasting by other international broadcasters.

The BBG continues to be a very active member of the High Frequency Coordination Conference (HFCC). The HFCC is a voluntary group sanctioned by the International Telecommunications Union (ITU) that coordinates frequency channels used in shortwave broadcasting. The group coordinates transmission schedules of approximately 60 organizations from more than 30 countries that represent about 80 percent of global HF (shortwave) broadcasting. The main objective of the HFCC is to provide the representation and services for the promotion of an efficient and economical use of the shortwave radio spectrum and the improvement of radio reception of worldwide broadcast transmissions.

The BBG is also an active member of many U.S. Government committees involving very detailed, inter-governmental spectrum policy issues such as the Interdepartmental Radio Advisory Committee (IRAC), Frequency Assignment Subcommittee (FAS), and Working Level Group G (WLG-G). We are constantly refining and updating our HF broadcasting schedule. This attention to the schedule ensures that the least number of frequencies are utilized while providing the best possible service to our listening audience. This efficient use of the HF spectrum results in savings in parts and power cost at our transmitter locations.

Regarding integration of spectrum management into strategic and capital planning processes, there is a well established Capital and Information Technology Planning Process within BBG/IBB that we use to help ensure our compliance with all relevant guidelines using Office of Management and Budget (OMB) Circular A-11. Our spectrum requirements are directly reflected in our annual budget process.

Regarding uses of new technology and examination of new technology, the BBG's IBB is a member of the consortium promoting the worldwide ITU standard for digital shortwave broadcasting, i.e., Digital Radio Mondiale (DRM). DRM represents a set of digital audio broadcasting technologies designed to work over the bands currently used for AM broadcasting, particularly shortwave. The BBG is waiting for lower cost digital receivers to drive the market place to allow DRM to become a realistic option for listeners within appropriate target areas before significant investments are made in this technology. Receiver prices have dropped every year since the advent of the DRM organization.

2. <u>Improvements to Capital Planning and Investment Control Procedures Consistent</u> with OMB Guidance:

As stated above, the BBG is an active participant in NTIA-led Working Level Group G.

3. Development of Second Agency-Specific Strategic Spectrum Plan:

The mission of the BBG is to ensure and safeguard the integrity, quality, and effectiveness of U.S. international broadcasters, and to promote freedom and democracy and to enhance understanding through multi-media communication of accurate, objective, and balanced news, information, and other programming about America and the world to audiences overseas.

The shortwave spectrum in the 3-30 MHz HF bands is vitally important to the BBG to continue its mission. International cooperation is needed to ensure that ITU allocations, regulations, and guidelines minimize interference and keep the background noise low to ensure sustainability of the radio delivery media. The BBG uses the HFCC (as stated above) to carry out this part of our mission.

We see a continued gradual decline in the BBG use of HF spectrum over time as other competing media such as TV, the Internet, and other mobile digital media devices continue to grow in popularity worldwide. BBG will likely continue a very modest increase in its use of FM and medium wave spectrum overseas.

Within the U.S., the BBG uses land mobile communications to support security and maintenance personnel at its Washington, D.C. headquarters and Greenville, NC locations. It also uses remotes broadcasting links and wireless microphones to support various important newsworthy events such as the Republican and Democratic National Conventions and the Presidential Inauguration.

4. Process to Evaluate Proposed Needs for Spectrum:

Our predominantly shortwave broadcasting spectrum needs are determined by mission criticality in reaching particular overseas target areas where listeners have sufficient HF receivers and funding is available to support that broadcasting method.

5. Activities and Progress with Respect to Use of Spectrum for COOP and COG Operations:

Our COOP and COG plans do not involve any new spectrum requirements and, indeed under a COOP scenario, we likely would greatly reduce HF spectrum use worldwide due to the lack of language specific programming that could be produced in such a scenario.