Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Delete, Delete, Delete	)	GN Docket No. 25-133
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COMMENTS OF
THE SOCIETY OF BROADCAST ENGINEERS, INC.

The Society of Broadcast Engineers, Inc. ("SBE")—the professional organization of television and radio engineers and those in related fields, with more than 4,500 members in 116 chapters worldwide—submits these comments in response to the Public Notice (the "Notice")[1] issued in the above-captioned proceeding. Through this proceeding, the Commission has the opportunity to provide meaningful relief to FM radio broadcasters by simply eliminating and modifying certain interference rules that have not kept pace with the state of modern radio receiver technology.

A. Intermediate Frequency Contour Rules are Antiquated and Should be Eliminated.

The FM radio industry faces significant and growing challenges in 2025, including largely static listenership numbers and decreasing revenues.[2] As a result, FM broadcasters must be afforded the regulatory opportunity to maximize their reach and preserve the crucial news, emergency, and entertainment services they have long provided to their local communities. In

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[1] Public Notice, *in re Delete, Delete, Delete*, DA 25-219 (Rel. Mar. 12, 2025).

[2] *See, e.g., 2024 Communications Marketplace Report*, FCC 24-136, ¶¶ 284-293 (Rel. Dec. 31, 2024); *Radio's Share of Audio Ad Dollars Shrinking as Total Spend Grows*, Cameron Coats (May 14, 2024).

other words, the more that FM broadcasters are able to expand their service area without causing harmful interference to nearby stations, the better chance broadcasters have to compete in the current media market and to best serve the public interest. The FCC can provide meaningful assistance in this effort simply by updating interference rules to account for modern receivers, which provide better means of interference protection than receivers available when many interference parameters were adopted.

FCC rules establish a range of minimum distance separations required between FM radio stations based on the class of station and channel adjacency, and provide a series of tables listing such minimum distances.[3] These Tables were initially calculated when the rule was established in the 1960s, and subsequent updates have not kept pace with available technology. In particular, rule 73.207 sets separation requirements related to intermediate frequency ("IF") and associated contours that are out of date. Older radio receivers used the IF signal of 10.7 MHz. as part of their demodulation scheme, which had the potential to create interference at that frequency. This led to the establishment of parameters and spacing requirements for IF interference protection in 1965[4] and such parameters have been periodically updated since that time. However, today's radio receivers offer significantly improved interference protections from high power radio frequencies. As such, it is no longer necessary for the Commission to mandate minimum separation IF distance and contours, and the relevant portions of the Tables contained in 73.207 should be revised to remove those requirements.

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[3] *See* 47 C.F.R. 73.207(b).

[4] *See* Report and Order, *in re Amendment of Section 73.207, Concerning Minimum Required Spacing Between FM Broadcast Stations to Provide for IF Interference Protection*, 45 F.C.C. 2541 (Adopted June 30, 1965).

B. FM Adjacent Channel Interference Criteria for Second and Third Channel Adjacencies Should be Eliminated or Reduced.

In addition to elimination of IF interference rules, the Commission can provide an even greater impact by removing or relaxing some second- and third-adjacency protections for FM stations. As with IF protections, significant improvements in interference mitigation by modern receivers has rendered these protections largely unnecessary.

1. Third-adjacent minimum spacing requirements should be eliminated or significantly reduced.

Congress and the FCC have previously acknowledged the superfluous nature of the pro forma interference protections provided by third-adjacent spacing requirements. Relying on an express recommendation from the FCC, the Local Community Radio Act of 2010 eliminated all third-adjacent spacing requirements between low power FM stations and other FM broadcast services,[5] preferring the use of more nuanced case-by-case interference determinations when necessary.[6]

This logical model for addressing third-adjacent interference concerns should be carried forward to other FM services. Certainly, there is little reason why interference concerns among other secondary FM services should be treated differently from LPFM stations. Thus, 74.1204(g)—which requires FM translators and boosters to adhere to minimum separation

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[5] Pub. L. No. 111-371, § 3(a) (2011); FCC, *Report to the Congress on the Low Power FM Interference Testing Program*, at 4 (Feb. 19, 2024) ("The Commission's technical studies similarly showed that LPFM stations do not pose a significant risk of causing interference to existing full-service FM stations or FM translator and booster stations operating on third-adjacent channels.").

[6] *See* 47 C.F.R. § 73.809.

(*Continued . . .*)

requirements of full power FM stations[7]—should be revised to eliminate the third-adjacency separation condition. Moreover, the Commission should consider eliminating or significantly reducing third-adjacency separation requirements for full power FM stations, with the option to require case-by-case interference analysis in line with current LPFM rules, if needed.

2. Second-adjacent minimum spacing requirements should be significantly reduced.

For the same reasons provided above, the Commission should consider significantly reducing second-adjacent minimum spacing requirements for all FM broadcast services. By reducing spacing requirements to appropriate levels based on modern receiver technology, the Commission will again allow FM broadcasters to maximize their stations' reach and service to their communities, and will lead to more efficient use of available spectrum.

Conclusion

FM broadcasters are dedicated to serving their local communities as effectively as possible, but their stations are currently unable to maximize possible impact in the market due to artificial, overly conservative spacing limits that no longer reflect interference protections warranted by modern receiver technology. Thus, the Commission should (1) eliminate IF spacing requirements; (2) eliminate third-adjacent spacing requirements for FM translators and FM boosters; and (3) consider significantly reducing second- and third-adjacent spacing requirements for full power FM stations. Doing so would have an immediate and meaningful impact on FM broadcasters by allowing them to maximize reach and service to their communities, and would foster increased efficiency in utilization of FM radio spectrum.

[7] 47 C.F.R. § 74.1204(g) (requiring FM translators and boosters to "meet the required separation distances set out in § 73.207").

Respectfully submitted,

The Society of Broadcast Engineers, Inc.

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