Pursuant to Section 1.415 of the Commission’s Rules, 47 C.F.R. § 1.415, National Public Radio, Inc. (“NPR”) hereby submits its comments on the Commission's Notice of Proposed Rulemaking (“NPRM”) in the above-captioned proceeding concerning licensing and operating rules for satellite services.¹

NPR is a non-profit, noncommercial membership organization of more than 900 public radio stations. While known for producing and distributing such noncommercial educational radio programming as All Things Considered, Morning Edition, Talk of the Nation, and Performance Today, NPR also manages and operates the Public Radio Satellite System ("PRSS"), which, for more than three decades, has enabled a broad and extremely diverse community of program producers and noncommercial educational radio stations to distribute programming for broadcast.

Visionary pioneers at NPR established this satellite-based interconnection system, the first of its kind, in the late 1970s. The PRSS operates in the C-band and Ku-band spectrum, interconnecting more than 400 downlinks located at public radio stations nationwide. More than

150 program producers use this system each year to deliver programs to stations. NPR is licensed to operate a small number of transmit and receive earth stations located at NPR’s headquarters in Washington, D.C. Additional transmit and receive earth stations that comprise key components of the PRSS are licensed or registered to, owned by, and located at a number of public radio stations across the country. The more than 400 interconnected public radio stations, including both NPR and non-NPR stations, maintain and operate receive-only earth stations in order to receive noncommercial educational, cultural, and informational programming from a multitude of program producers for broadcast to a diverse public — including rural, minority, and other unserved and underserved audiences.

NPR is pleased with the FCC’s efforts to update and streamline regulatory requirements for satellite services through revision of Part 25. Of particular interest to NPR is revision of Section 25.281 “Automatic Transmitter Identification System (ATIS).” The FCC’s proposed changes to Section 25.281 reflect the transition from the use of analog modulation techniques to the use of digital modulation techniques for broadband video signals today. NPR supports the FCC’s proposal to revise the caption of Section 25.281 to “Transmitter identification requirements for satellite video transmissions from fixed earth stations.”

NPR agrees with the FCC’s proposal to limit the number of different techniques that operators use to transmit ATIS information in digitally modified uplink signals in order to avoid unduly burdening satellite network operators. The FCC proposes to allow two methods of including ATIS information in digitally-modified uplinks. NPR is strongly in favor of the first method proposed in the NPRM, which involves insertion of ATIS information into the Network

---

2 NPRM at 42, ¶150.
3 NPRM, Appendix A at 76, ¶54.
4 NPRM at 43, ¶151.
Information Table of an MPEG transport stream.\textsuperscript{5} NPR suggests that this method be allowed, and NPR is also not opposed to the second method proposed by the FCC, which requires the transmission of digital broadband video uplink signals to be accompanied by a low-data-rate spread-spectrum signal carrying the ATIS information.\textsuperscript{6}

Regarding content requirements for ATIS signals, NPR feels that the information currently required by Section 25.281(d)(3) is inadequate. NPR supports an additional requirement that the geographic location of the earth station be included in the ATIS data transmitted on digitally-modified uplinks.\textsuperscript{7} However, a specific format for the ATIS message is not required; NPR supports the FCC’s proposed language of the revised Section 25.281(c), which only requires the ATIS message to be submitted in an unencrypted ASCII text format that can be displayed using readily-available computer terminal emulation software.\textsuperscript{8}

**Conclusion**

NPR is pleased with the FCC’s efforts to update and streamline regulatory requirements for satellite services through revision of Part 25. NPR is supportive of revisions to Part 25 that reflect the transition from the use of analog modulation techniques to the use of digital modulation techniques for broadband video signals today. NPR agrees that including ATIS information into the Network Information Table of an MPEG transport stream should be an allowed method of identification. NPR encourages the FCC to require that the geographic location of the earth station be included in the ATIS data. NPR feels that submitting the ATIS message in an unencrypted text format that can be easily decoded and displayed is sufficient.

\textsuperscript{5} NPRM at 43, ¶151.
\textsuperscript{6} NPRM at 43, ¶151.
\textsuperscript{7} NPRM at 43, ¶152.
\textsuperscript{8} NPRM, Appendix A at 77, ¶54.
Respectfully submitted,

NATIONAL PUBLIC RADIO, INC.

Pete Loewenstein  
Vice President, Distribution
Michael Starling  
Chief Technology Officer and Executive Director,  
NPR Labs
Michael Riksen  
Vice President, Policy & Representation
Rishi Hingoraney  
Director of Public Policy and Legislation
/s/ Mariah Dodson  
Counsel

January 14, 2013