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May 28, 2020

Marlene H. Dortch, Secretary

Federal Communications Commission 445 12th Street, SW

Washington, DC 20554

# Re: Written Ex Parte, RM-11854

Dear Ms. Dortch:

Xperi Corporation (“Xperi”), the developer and licensor of HD Radio™ technology, filed comments in this docket on May 4, 2020 encouraging the Commission to gather more specific information on how ZoneCasting technology developed by GeoBroadcast Solutions, LLC (“GeoBroadcast”) would impact the listener experience before proceeding to a Notice of Proposed Rulemaking (“NPRM”). The comments demonstrated concern with how ZoneCasting technology may impact HD Radio, as one of the key requirements of the HD Radio system is the simulcasting of the analog service on the HD1 digital channel, meaning that radios are designed to blend between analog and HD1 digital audio during initial tuning or under weak signal conditions.

Since filing our comments, we have engaged in conversations with GeoBroadcast and understand that it is planning demonstrations for how ZoneCasting will be deployed in a digital setting. These demonstrations will involve local broadcasters and be overseen by third-party engineering consultants Roberson and Associates. Xperi will work with GeoBroadcast to develop appropriate test plans to provide data demonstrating the ZoneCasting experience on HD Radio stations. Xperi also will provide technical support in implementation of the tests and evaluation of the results. We look forward to working with GeoBroadcast to understand how ZoneCasting implementations impact the HD Radio experience.

Given our conversations with GeoBroadcast and the planned demonstrations, Xperi suggests that the Commission continue with the process to move toward an NPRM. The NPRM process will give all parties ample time to explore these various issues.

Sincerely,

Paul Davis

General Counsel, Xperi Corporation

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# CERTIFICATE OF SERVICE

I, Kim Riddick, hereby certify that on this 28th day of May, 2020, I caused a true and correct copy of the foregoing to be served by e-mail and U.S. mail on:

Gerard J. Waldron Covington & Burling LLP 850 Tenth Street, N.W. Washington, DC 20001 [gwaldron@cov.com](mailto:gwaldron@cov.com)

*/s/ Kim Riddick*

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