

December 30, 2021

Via IBFS and Email

Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

**Re: In the Matter of Application of DPA Mac LLC for an International Broadcast Station;
IBFS File No. IHF-C/P-20201228-00010.**

Dear Ms. Dortch:

Consistent with section 1.1204(a)(10) of the FCC's rules, counsel for DPA Mac LLC ("DPA Mac") files this *ex parte* letter to supplement the record for DPA Mac's pending application at the request of staff.¹

On December 3, 2021, John Castle and Trey Hanbury of Hogan Lovells US LLP met with Brandon Moss, Katie Mellinger, James McLuckie, Thomas Lucey, and Olga Madruga-Forti of the FCC's International Bureau to discuss DPA Mac's application to construct a station in the international high-frequency broadcast service. Counsel for DPA Mac described its operations, service, ownership, technical expertise, and the waiver requests contained in its initial application. DPA Mac explained how the public would benefit from access to business information on the main broadcast channel and how the operation's supplemental datacasting service would increase the proposed service's economic stability.

During the meeting, Commission staff posed a number of questions. Responses to those questions appear below.

1. **Will the datacast be encoded or encrypted?** DPA Mac will transmit data using the Digital Radio Mondiale (DRM) standard without encoding or encryption. Anyone possessing commercial, off-the-shelf equipment capable of receiving DRM signals will be able to listen to the DRM audio program and view the DRM datacast. DPA Mac will use the datacast to convey information of general interest to all listeners, such as station identification information or lists of alternative frequencies where listeners can tune to DPA Mac content. Within and immediately adjacent to the DRM emissions envelope will be a supplemental, fee-for-service datacast optimized for low-latency transmissions. This supplemental datacast will be encoded and employ a proprietary modulation. DPA Mac intends to use revenue from the supplemental datacast to help offset some of the expense of constructing and operating the DRM broadcast station.
2. **Will special equipment be required to receive and understand the datacast?** Special equipment will not be required to receive the DRM datacast; any party may receive the DRM datacast using commercial, off-the-shelf equipment. However, the supplemental datacast

¹ 47 C.F.R. § 1.1204(a)(10).

employs a proprietary modulation to reduce latency without creating harmful interference to the primary DRM channel. DPA Mac will use purpose-built equipment to transmit, receive, encode, and decode the supplemental datacast for the benefit of fee-for-service customers.

3. **Will lower power affect the number of potential recipients?** DPA Mac's equipment is designed to reliably convey DRM signals to distances of more than 10,000 kilometers across all types of morphologies, including urban areas. Moreover, the areas with the greatest need for DRM radio—that is, the communities most likely to have few alternative sources of business news and information other than a DRM signal—are rarely located in urban areas, which are already well served by traditional radio, television, and fixed and mobile broadband services.
4. **Can DPA Mac provide more information regarding its relationship with Raft Technologies and 3DB Communications Inc.?** DPA Mac is a closely held, limited liability company registered in the state of Delaware. Seth Kenvin is President of DPA Mac and exercises full control over the company. DPA Mac has entered into an arms-length contract with Raft Technologies to serve as a technical consultant and provide engineering expertise regarding DPA Mac's proposed service. To date, Raft Technologies has assisted DPA Mac with developing and defining the technical parameters of the proposed service. Raft Technologies has provided similar services to 3DB Communications, which has performed a market trial pursuant to an experimental license.² For example, with Raft Technologies' assistance, 3DB has used trained engineers to operate, monitor, and report the status of transmissions in real time from a dedicated network operations center and, over time, refine the service offering so that it is sustainable. As discussed in the application, DPA Mac proposes to continue offering the services that 3DB has provided pursuant to its market trial authorization.

Please let us know if you have any questions.

Sincerely,

/s/ Trey Hanbury

Trey Hanbury

Partner

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² See Call Sign WI2XXG, ELS File No. 0094-EX-CM-2021.