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January 7, 2022

Via Electronic Filing

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

Donna A. Balaguer
Principal
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202 626 7719 direct

**Re: Ex Parte Presentation
Parable Broadcasting Company, LLC, Application to Construct an
International Broadcast Station, File No. IHF-C/P-20200427-00001**

Dear Ms. Dortch:

On April 27, 2020, Parable Broadcasting Company, LLC (“Parable”) filed the above-referenced application requesting authority to construct an international high frequency (“IHF”) broadcast station. At the request of Commission staff for clarifying information, Charles Schue of Parable and the undersigned counsel spoke via video conference on January 5, 2022 with the following individuals (in alphabetical order) from the Commission: Thomas Lucey, Olga Madruga-Forti, James McLuckie, Katie Mellinger, Brandon Moss, and Shawna Prebble.

Parable explained that the proposed station will take advantage of the DRM standard and new technologies to maximize use of the proposed frequencies by simultaneously broadcasting both audio and data content. Parable confirmed that its proposed station complies with the parameters of the FCC’s IHF rules, including the bandwidth and power rules, and it has not requested nor requires any waivers. Parable confirmed that it understands the IHF licensing process and its license, if issued, would be subject to the periodic assignment of frequencies and other seasonally-issued parameters.

Commission staff queried the nature of the proposed broadcasting. Parable confirmed that it will (1) broadcast audio and datacast content in accordance with the DRM standard, (2) the audio and datacast content will transmit simultaneously and share the proposed 10 kHz bandwidth, and (3) the broadcast will be receivable by any member of the public with a DRM-compatible receiver located within the station’s reception range. DRM-compatible receivers are off-the-shelf and commercially available at major retailers serving consumers. The broadcasted content will not be encrypted.

With respect to audio content, Parable explained that it had discussions with a national Catholic radio/television programmer and a renowned educator and author that are both interested in broadcasting audio content on the station to overseas listeners. Parable has observed a lack of capacity for transmitting content internationally, and expects to obtain additional audio content if issued the license. Again, this content would be received by any person in range with a standard DRM-compatible receiver. With respect to datacast content, Parable explained that it will also

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broadcast data content provided by third parties. Datacast could include, for example, closed captioning delivered contemporaneously with an audio program and financial and other news. Parable explained that a datacast content provider could deliver content that is encoded at times, i.e., it would be broadcast alongside the audio content, which is receivable by a standard DRM-compatible receiver, but the meaning of the content may be indecipherable to parties other than the content provider. This content is expected to be a negligible portion of the datacast airtime and will not interfere in any way with the simultaneously broadcasted audio content. Parable's use of innovative technology to provide these types of different audio and datacast content streams will maximize use of the frequencies, as well as support for the station and its financial viability. In response to a Commission query, Parable confirmed that the datacast airtime will be available to all interested parties just like the audio airtime, and Parable has no current plans to limit available datacast airtime to any particular type of content or content provider. Finally, Parable confirmed that it will not be offering a subscription service on the station, nor does it have any knowledge (nor would it endorse) that any content provider would provide a subscription service related to the station's content.

Parable appreciates the opportunity to provide clarifying information and will remain responsive to any further questions.

Sincerely,

/s/ Donna A. Balaguer

Donna A. Balaguer
Principal, Fish & Richardson P.C.
Counsel to Parable Broadcasting Company, LLC

cc (via email):

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