

**SEPARATE STATEMENT OF  
COMMISSIONER KATHLEEN Q. ABERNATHY**

*Re: Interference Immunity Performance Specifications For Radio  
Receivers (ET Docket No. 03-65); Review of the Commission's Rules and  
Policies Affecting the Conversion to Digital Television (MM Docket No. 00-39),  
Notice of Inquiry*

Today's NOI is an important step toward improving the Commission's spectrum management policy. As part of its approach, the FCC traditionally has relied primarily on approaches that control the emissions and locations of transmitters and the frequencies used by specific types of radio operations. While this method has worked in the past, the changing pace of technology and the increasing demands placed on the spectrum resource indicate that it is time for the FCC to look into changing its approach. Accordingly, and as recognized in the Spectrum Task Force Report, I believe that this NOI moves the FCC in the right direction by promoting a more flexible and market-oriented approach to setting interference immunity performance standards for radio receivers.

Today's NOI sets the stage for the FCC to gather data from all interested parties on ways to ensure flexibility to allow for the introduction of new digital radio technologies and to allow licensees the flexibility to implement new technologies in receiver standards. Importantly, the NOI proposes to accomplish this through the imposition of both voluntary guidelines and, where appropriate, mandatory rules. This approach is consistent with my view on spectrum management that where possible, the FCC should afford licensees flexibility in the deployment of technologies.

At the end of the day, this proceeding will have a direct impact on the every day life of American consumers. For example, the information gathered in this proceeding will form the basis for the interference standards for many of the items we each use on a daily basis including the next generation of digital televisions and AM/FM radios. I look forward to gathering a record in this proceeding that will help us harness the enormous potential of spectrum-based services to bring to consumers innovative technologies and new services.