

**SEPARATE STATEMENT OF
COMMISSIONER MICHAEL J. COPPS**

RE: Interference Immunity Performance Specifications for Radio Receivers; Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television, ET Docket No. 03-65, MM Docket No. 00-39

This NOI is important and forward looking. I commend the Chairman and OET for beginning the process of systematically exploring how the Commission can further our statutory responsibility to increase the efficiency and intensity of use of the spectrum through receiver standards. The Commission usually focuses on transmitters in interference disputes. This, potentially, is a mistake. We must understand whether there are actions that industry and the Commission can take to ensure that unreasonably fragile receivers do not undermine the efficient use of our spectrum resource. But we must also understand the costs of designing more robust receivers. This NOI will begin that process, and I look forward to receiving a full record.