

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D. C. 20554**

In the Matter of )  
Authorizing Permissive Use of the “Next ) GN Docket No. 16-142  
Generation” Broadcast Television Standard )

**Comments of Hatfield & Dawson Consulting Engineers, LLC**

Hatfield & Dawson Consulting Engineers, LLC submit these comments in response to the above-referenced Notice of Proposed Rulemaking. As a consulting engineering firm specializing in radio communications and applied radio physics, our primary concern with the issues raised in the NPRM is with minimizing the potential for intersystem interference among users of the broadcast spectrum.

In the NPRM, at paragraph 8, the Commission states:

*“LG and others suggest that we also may need to incorporate A/322:2016 “Physical Layer Protocol” (A/322), the other component of the ATSC 3.0 physical layer, into our rules because it completes the description of the core RF waveform used by the standard. At the time that the Petition was filed, A/321 was the only part of the ATSC 3.0 physical layer that had been ratified by the ATSC. Subsequent to the Petition, the ATSC has also ratified the A/322 part of the ATSC 3.0 physical layer. As discussed in Section III(E) below, LG requests the incorporation of A/322 into our rules in order to ensure that broadcasters will have the flexibility to operate certain types of single frequency networks. LG further notes that by addressing the entire physical layer (both ATSC A/321 and A/322) in one rulemaking, the Commission can avoid the need for a future, separate rulemaking to authorize use of A/322. We seek comment on whether we should incorporate A/322 into our rules.”*

It would appear that the timing of the Petition for Rulemaking on this subject, and therefore the adoption of the NPRM itself were unfortunate, in that the A/322 standard had not yet been officially adopted.

While in general we support a minimum of regulation, fundamental technical standards must be a part of the regulation package. A/321, by itself, is insufficient to define the

waveform and interference requirements. A possible solution would be to incorporate A/322 as a part of the Commission's rules, applicable to television broadcast content, allowing flexibility for use of non-television content so long as the basic emission waveform criteria are met, since A/321, by itself, is insufficient to define the waveform and interference criteria.

Respectfully submitted,

Hatfield & Dawson Consulting Engineers, LLC

A handwritten signature in blue ink, appearing to read "Benj. F. Dawson III", written in a cursive style.

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Benj. F. Dawson III, P.E.,