

July 5, 2017

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Media Bureau Seeks Comment on Joint Petition for Rulemaking of APTS, AWARN Alliance, CTA, and NAB Seeking to Authorize Permissive Use of the Next Generation TV Broadcast Television Standard, GN Docket No. 16-142

Dear Ms. Dortch:

On June 30, 2017, Rick Chessen, William Check, Andy Scott and Diane Burstein, all of NCTA - The Internet & Television Association, accompanied by its consultant Jeff Krauss, met with the following FCC staff: from the Media Bureau, Michelle Carey, Nancy Murphy; Media Bureau Policy Division, Martha Heller, Steven Broeckert, Brendan Murray, Evan Baranoff, Kathy Berthot, Diana Sokolow, F. Mario Trujillo, Mason Shefa, Nicole Desbois; Media Bureau Engineering Division, John Wong; Media Bureau Video Division, Barbara Kreisman; Office of General Counsel, Susan Aaron, David Konczal; Office of Engineering & Technology, Martin Doczkat, Mark Colombo; and the Consumer and Government Affairs Bureau, Darryl Cooper, Sarah Burgart.

During our meeting, we discussed the need for the Commission to ensure that the broadcasters' roll-out of ATSC 3.0 does not disrupt consumers or impose costs and burdens on cable operators. In particular, we described how launch of the ATSC 3.0 signal could threaten a cable operator's ability to continue to provide its customers with a high quality ATSC 1.0 signal and reiterated our position that the Commission should require broadcasters to continue to transmit a robust ATSC 1.0 signal during the transition period to ATSC 3.0. That means, among other things, that broadcasters' ATSC 1.0 transmissions during the transition must meet the following criteria:

- (1) The ATSC 1.0 signal must continue to serve the same coverage area as it did prior to the transition to ATSC 3.0;
- (2) The ATSC 1.0 signal must continue to serve the same community of license as it did prior to the transition to ATSC 3.0;
- (3) The ATSC 1.0 signal must maintain the same audio and video signal formats it had prior to the transition to ATSC 3.0; and

- (4) The ATSC 1.0 signal must simulcast the programming that is being transmitted on the ATSC 3.0 signal except where technically infeasible due to the nature of ATSC 3.0.

We also noted the importance of the Commission including not only the A/321 standard in its rules, but also A/322, to ensure that cable operators can continue to receive an interference-free ATSC 1.0 signal after the ATSC 3.0 signal is launched.

Additionally, we described the many issues that remain to be resolved that affect cable systems' ability to transmit an ATSC 3.0 signal, and that the relevant technical specialist groups within ATSC were still working through a number of those issues. These include recommended practices for the conversion of ATSC 3.0 services into ATSC 1.0 services so that hardware or software products can be built to implement conversions to formats suitable for ATSC 1.0 redistribution systems or ATSC 1.0 over the air broadcast, including conversion methods for transport, audio, video and ancillary data formats.

Finally, we discussed the need for mandatory carriage rights to attach only to the ATSC 1.0 signal during the transition period. Moreover, as our written comments explain, in these unique circumstances, and especially while transmission of an ATSC 3.0 signal is to be completely voluntary, there is no basis for allowing broadcasters to use access to an ATSC 1.0 signal to secure new carriage rights for ATSC 3.0 signal in a manner that imposes costs and hardships on MVPDs and their customers.

Respectfully submitted,

/s/ **Rick Chessen**

Rick Chessen

cc:	Michelle Carey	Nancy Murphy	Martha Heller	Steven Broeckaert,
	Brendan Murray	Evan Baranoff	Kathy Berthot	Diana Sokolow
	F. Mario Trujillo	Mason Shefa	Nicole Desbois	John Wong
	Barbara Kreisman	Susan Aaron	David Konczal	Martin Doczkat
	Mark Colombo	Darryl Cooper	Sarah Burgart	