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November 18, 1987

Mr. William J. Tricarico
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: MM Docket No. 87-268
RM-5811

Dear Mr. Tricarico:

Transmitted herewith, on behalf of King Broadcasting Company and Nationwide Communications Inc. are an original and five copies of their Joint Comments in the above-captioned proceeding.

Should any questions arise concerning this matter, please contact this office.

Very truly yours,
FLETCHER, HEALD & HILDRETH

Frank R. Jazzo
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FRJ/jem
Enclosure

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BEFORE THE
Federal Communications Commission

WASHINGTON, D.C. 20554

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Federal Communications Commission
Office of the Secretary

In the Matter of)
)
Advanced Television Systems) MM Docket No. 87-268
and Their Impact on the) RM-5811
Existing Broadcast Service)
)
Review of Technical and)
Operational Requirements:)
Part 73-E, Television)
Broadcast Stations)
)
Reevaluation of the UHF)
Television Channel and)
Distance Separation)
Requirements of Part 73)
of the Commission's Rules)

JOINT COMMENTS

King Broadcasting Company ("King"), licensee of television broadcast stations in Washington, Oregon, Idaho and Hawaii; and Nationwide Communications Inc. ("NCI"), licensee of television broadcast stations in Tennessee, Virginia, Wisconsin and Minnesota, by their attorneys, hereby comment on the Commission's Notice of Inquiry ("NOI") in the above-referenced proceeding, 2 FCC Rcd. 5125 (1987).

1. King and NCI were among the 55 broadcast organizations and companies that joined the Association of Maximum Service Telecasters ("MST"), the National Association of Broadcasters ("NAB") and the Association of Independent Television Stations ("INTV") in petitioning the Commission to adopt a Notice of Inquiry concerning the impact on the existing terrestrial television broadcasting industry from the introduction of

advanced television systems ("ATV") in the video marketplace. With respect to the NOI adopted by the Commission, King and NCI generally support the comments being filed by MST and NAB.

2. While the NOI raises numerous complex technical issues regarding the deployment of ATV systems, a major television industry effort is currently underway to carry out the development, testing and evaluation necessary to address the issues raised by the NOI concerning the capabilities and spectrum needs of specific ATV systems and the costs associated with implementing them. It is currently estimated that such development and evaluation can be completed in the next two to three years. Thus, it is essential that the Commission take no action to preclude the ultimate implementation by terrestrial broadcasters of any of the various ATV systems being evaluated.

3. The advent of ATV promises to revolutionize the video marketplace. Local television broadcasters have been instrumental in the introduction of previous technical innovations, such as color television and stereo television. The technical limitations of the present 6 MHz NTSC video format, however, may foreclose local broadcasters from implementing an ATV system of comparable quality with that which will be available through non-broadcast video delivery systems.

4. It is of paramount importance that local broadcasters have the opportunity to implement a competitive ATV system which

includes such improvements as a wider-aspect ratio, substantially improved vertical and horizontal static resolution, high-quality motion reproduction and compact disk-quality sound. Without ATV, local broadcasters will be operating at a severe disadvantage in the video marketplace in relation to non-broadcast ATV video delivery systems and the very viability of free, universally available local broadcast television service could be threatened.

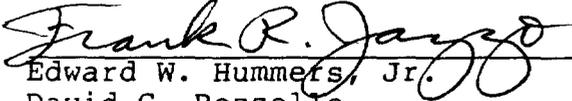
5. The implementation of an ATV system which is compatible with the current universe of NTSC receivers is a vital element in achieving a smooth transition to ATV. The development of an ATV system which can be viewed on existing NTSC receivers with an NTSC-quality picture without a converter or with an inexpensive decoder must be a high priority. Great weight should also be given to the development of an ATV system which is compatible with the current 6 MHz channelization scheme for terrestrial broadcasters. This may be accomplished either through a single-channel 6 MHz ATV system or through the use of existing channels and an augmentation channel of 3 to 6 MHz in width.

6. The Commission should employ a comprehensive approach for developing and testing new terrestrial ATV transmission systems. Decisions cannot be made in a vacuum with respect to spectrum requirements, interference protection standards and ATV system performance. These issues are interrelated and should be treated in a unified manner.

7. In conclusion, King and NCI support industry efforts to develop, test and evaluate ATV systems. Local broadcasters must have the opportunity to provide their viewers with an ATV system on par with those available through non-broadcast delivery means. Great emphasis must be placed on developing a true ATV system that is compatible with existing NTSC receivers. The failure to provide for such a terrestrial ATV transmission system may result in severe consequences for the local broadcast television industry.

Respectfully submitted,

KING BROADCASTING COMPANY
NATIONWIDE COMMUNICATIONS INC.

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