

RECEIVED
NOV 18 1987
ORIGINAL FILED

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554
Federal Communications Commission
Office of the Secretary

In the Matter of)
)
Advanced Television Systems)
and Their Impact on the)
Existing Television 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)

MM Docket No. 87-268
RM-5811

TO: The Commission

COMMENTS OF TRIBUNE BROADCASTING COMPANY

Tribune Broadcasting Company ("Tribune"), by its attorneys, hereby submits its Comments in the above-captioned proceeding. 1/ As the Commission's comprehensive Notice of Inquiry ("NOI") makes clear, the American broadcast television industry now stands at a crossroads perhaps more important than any yet encountered in its forty-year history. Without question, the choices made by the Commission will determine the course of the industry, and, to a great degree, the level of

1/ Tribune, through its subsidiaries, owns and operates independent commercial television stations in New York City (WPIX-TV), Los Angeles (KTLA), Chicago (WGN-TV), Atlanta (WGNX), Denver (KWGN-TV), and New Orleans (WGNO-TV).

015

local television service provided to the American public, for decades to come.

The Commission's NOI and its appointment of a blue-ribbon Advisory Committee reflect a careful, comprehensive approach to this critical issue which Tribune wholeheartedly endorses. It is extremely important, in Tribune's view, that this sound approach continue if the myriad technical, economic, and policy questions presented by advanced television systems are to be considered in the thoughtful, reflective manner that they demand. Precipitous action, taken without full knowledge or consideration of possible consequences, could irreparably damage the American broadcast industry and the interests of the viewing public.

Accordingly, for the reasons set forth below as well as in the Comments filed this date by the Association of Maximum Service Telecasters ("AMST") and the National Association of Broadcasters ("NAB"), Tribune strongly urges the Commission to proceed cautiously in its consideration of technical standards, interference criteria and, most importantly, spectrum reallocation, until substantially more data is available concerning the various advanced television systems now under development.

I. DEVELOPMENT AND ADOPTION OF A SINGLE STANDARD FOR
ATV IS OF CRITICAL IMPORTANCE TO THE FUTURE OF
LOCAL BROADCASTERS IN THE UNITED STATES.

The technical issues confronting the Commission with respect to the eventual adoption of a broadcast advanced television ("ATV") standard are enormously complex. The most pressing question posed by the advent of ATV technology is in Tribune's view, however, quite simple: How will terrestrial broadcasters remain competitive with other video delivery systems like cable and DBS should they commence transmission of satellite-delivered "MUSE" signals, and other high definition television ("HDTV") material, in the early 1990s? 2/ Given the United States' unique system of local, universal service, it is incumbent that national policy in this emerging "Communications Age" continue to offer local, universal service and not divide our population into those that by geography or wealth can be classified either as information rich or poor.

There is no longer any question that advanced television services will be made available to the American

2/ The National Association of Broadcasters ("NAB") estimates that between one and two million MUSE-ready television receivers will have been purchased by American consumers by the middle of 1992. That number can be expected to grow quickly as the cost of equipment comes down and the dramatically improved quality of the MUSE picture becomes widely appreciated by the public. High-definition video-discs are also expected to be available by 1990, as are inexpensive MUSE-to-NTSC converters. The converted picture, while not high-definition, will be somewhat better than today's NTSC image. See "High Definition Television: Getting the Picture," Broadcasting, October 26, 1987, p. 70.

public via various nonbroadcast media. The only issue is whether and how the viewing public will be able to obtain ATV service. The future of local, community-oriented broadcast service literally hangs in the balance. Only by providing a broadcast signal roughly comparable in quality will broadcasters prevent free, local television in America from degenerating into a "second class" program service. 3/

Comparable signal quality alone, however, will not suffice. If at all possible, the ATV system ultimately adopted should be compatible with the existing channel allocation structure and should be receivable on existing NTSC receivers without significant degradation in signal quality.

The ATV systems now under development have a variety of spectrum needs. The MUSE system, for example, requires a single channel bandwidth of 8.1 MHz and, thus, is incompatible with the current NTSC allocation plan. Other systems also require more bandwidth than the 6 MHz NTSC channel but solve the need for additional spectrum by utilizing augmentation

3/ As Tribune repeatedly emphasized in its comments in Docket 85-172, the Commission's UHF/Land Mobile spectrum sharing proceeding, such a result would render ATV a premium service available only to that relatively small portion of the population able to afford cable, satellite or home video subscriptions and equipment. Plainly, such developments would not serve the public interest. Both the NAB and the Association of Maximum Service Telecasters ("AMST") also cogently have developed this point at some length in their Comments in this proceeding, as well as those filed in Docket 85-172.

channels of 2 - 3 MHz. 4/ Others, including NBC's recently announced "ACTV" system are designed to operate within the constraints of the 6 MHz NTSC channel bandwidth. While an ATV system that would operate on a 6 MHz channel might very well be preferable, it is not yet clear that a satisfactory system can be developed in a timely fashion. However, even if more than 6 MHz is required to deliver an ATV signal, the current channel allocation structure should be abandoned only as a last resort. Broadcasters have expended substantial time, energy, and money in developing and providing service under the existing 6 MHz channel structure. Adoption of an ATV system incompatible with that structure would result in serious dislocations for both the industry and the viewing public.

Similarly, Tribune believes that whatever ATV system ultimately is adopted should be receivable on existing NTSC receivers with minimal or no degradation in the quality of the picture. AMST estimates that Americans own 130 million televisions valued at over \$80 billion. 5/ Given the \$1,000 minimum likely cost of an enhanced television receiver, many Americans simply will be unable to replace their present NTSC sets even if compelled to do so. Recognizing that, a

4/ The systems under development by North American Philips and the New York Institute of Technology, for example, are both dependent upon the use of presently fallow UHF frequencies to deliver the supplemental information needed to constitute an ATV image.

5/ See Broadcasting, October 26, 1987, supra.

broadcaster could be presented with the Hobson's choice of blacking out a good portion of its viewers in order to bring enhanced service to the financially better off portions of its audience, or foregoing the improvement of its signal in order to retain a larger number of viewers and broader demographics.

Finally, Tribune wishes to emphasize its belief that, whatever ATV system finally is implemented in the United States, it should be a single system, adopted by the Commission, for use by both broadcast and nonbroadcast media. As illustrated by the Commission's marketplace approach to AM stereo, the market is a slow and often unwieldy mechanism for selecting a single technical standard. Yet such a standard is precisely what ultimately will be necessary if ATV service is to be universally available in this country. Once the developmental work is over and the test results evaluated, Commission action will be the only practical way to achieve a single ATV standard within the necessary time period.

II. RESEARCH MUST CONTINUE ON ALL FRONTS
TO MEET THE LONG-TERM NATIONAL GOAL
OF TRUE HIGH DEFINITION TELEVISION.

While the need for industry and Commission action on ATV cannot be understated, there is an equally compelling need to avoid acting hastily. Although there is much to commend a 6 MHz ATV system, it is not at all clear that such a system can be developed. For example, while the 6 MHz advanced television system recently unveiled by NBC holds substantial promise, it

thus far has been tested only with computer simulation. Hardware for the system, which currently is under development, has yet to be tested. Similarly, other such systems are only in the developmental stage. Thus, it may well be that ATV will prove unachievable within the confines of a 6 MHz channel and that true over-the-air ATV can be provided only by using additional spectrum. As NAB and AMST point out in their Comments, it is simply too soon to tell.

It is extremely important, therefore, that the Commission not act prematurely to reallocate potentially critical spectrum to competing terrestrial or satellite services. As the Commission itself recently observed, "[T]he future of television technology is a matter of great importance and . . . we must have an adequate body of knowledge on which to base our decisions before foreclosing any options." 6/

CONCLUSION

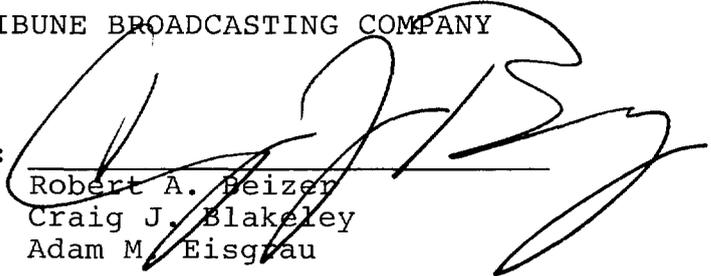
Tribune supports the Commission's current approach to the important issue of advanced television technology, including its deferral of action on the question of spectrum reallocation. Tribune agrees that research directed to the development of a single ATV standard must proceed as quickly as possible. However, until the necessary data has been

6/ See Further Sharing of UHF Television Band, FCC 87-327, released October 21, 1987 at 2.

obtained, the Commission should proceed cautiously in taking further action on spectrum allocation, technical standards, and other related issues.

Respectfully submitted,

TRIBUNE BROADCASTING COMPANY

By: 

Robert A. Feizer
Craig J. Blakeley
Adam M. Eisgrau

SCHNADER, HARRISON, SEGAL & LEWIS
1111 19th Street N.W.
Suite 1000
Washington, D.C. 20036
(202) 463-2900

Its Attorneys

November 18, 1987