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Before the
Federal Communications Commission
Washington, D.C. 20554

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JAN 19 1988

Federal Communications Commission
Office of the Secretary

In The Matter of]
]]
Advanced Television Systems]
and Their Impact on the]
Existing Television Broadcast]
Service]]
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Review of the Technical and]
Operating Requirements:]
Part 73-E, Television]
Broadcast Stations]]
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]]
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

REPLY COMMENTS OF THE
NATIONAL ASSOCIATION OF BROADCASTERS

The National Association of Broadcasters submits herewith its Reply
Comments in response to Comments filed in the above captioned proceeding.

I. INTRODUCTION AND SUMMARY

The comments filed in this proceeding are in general agreement that the
advent of advanced television (ATV) systems, including high definition television
(HDTV), presents today's free over-the-air television broadcast service with a
significant competitive challenge that, when met, as it indeed will be, will present
to the American public a new viewing experience of exciting dimension.

The comments, however, almost universally advise the Commission to
proceed deliberatively and to base its decisions regarding an ATV broadcast service

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- most particularly including decisions as to spectrum - on an adequate technical record. The technical record, the comments indicate, is clearly insufficient at this time. It is insufficient for industry decisions, and it is insufficient for Commission decisions. It is however, in a sure process of development.

NAB again echoes the concerns of broadcasters, manufacturers and others that, while analysis and testing proceed apace, decisions simply must await sound technical results. NAB urges the Commission not to act prematurely. We also urge the Commission to address issues raised in the Notice of Inquiry ("Notice") in separate stages over the course of this proceeding so that focused and meaningful attention can be given to each set of issues as it is warranted.

NAB believes that the Commission, mindful as it is of the extraordinary efforts now underway to develop a new system of ATV for over-the-air broadcasting, will recognize the enormity of the tasks before us. We are confident that the Commission will act appropriately and only when sufficient information is in the record in this proceeding to justify its action.

II. THE COMMENTS URGE THE COMMISSION NOT TO ACT PREMATURELY ON THE ISSUE OF SPECTRUM REQUIREMENTS FOR BROADCAST HDTV.

The various ATV systems now under consideration for and by terrestrial broadcasting differ greatly in their features and, importantly and correspondingly, in their spectrum requirements. The critical operational and performance testing of these systems planned by the Advanced Television Systems Committee (ATSC) will produce the information necessary to a meaningful assessment of the quality-for-bandwidth tradeoffs of each system.¹ The most agreed-on point presented in the comments in this proceeding is that not enough information currently exists to

¹ See ATSC Comments, *infra*.

assess the amount of additional spectrum required for ATV broadcasting and, therefore, that the Commission can not yet act on the spectrum requirement issues in this proceeding.²

NAB believes that the public interest can be served only by a deliberative and technically justifiable approach whereby spectrum decisions are made only when sufficient information is in the record of this proceeding to support those decisions. To do otherwise, in NAB's opinion, would risk either: 1) overestimating the amount of additional spectrum required for ATV broadcasting, thereby wasting for some considerable time into the future this valuable resource and, possibly, at the same time, encouraging inefficient later spectrum decisions for ATV, or 2) underestimating spectrum requirements for ATV broadcasting, thereby undermining the industry's efforts to develop an ATV system competitive with other media employing HDTV. Such might serve short term spectrum efficiency goals but it would, most certainly, deny to the whole of the American viewing public the future and the promise of this great technological advancement. An affirmative Commission choice to so limit the technological development of terrestrial broadcasting may well bring to an end the American tradition of free, universally available, high quality video programming. These outcomes are clearly undesirable - - and, in fact, unnecessary.

The interrelationship of spectrum, performance, interoperability and interference as to the various ATV transmission systems is well-recognized. Both the Commission's Advanced Television Service Advisory Committee (ATS-AC) and the ATSC studies have critical analysis of these factors as objectives. These committees are working, to put it bluntly, fast and furiously. But it is obvious to all involved that, to be accurate and realistic, a considerable amount of time as well

² See Appendix A.

as resources will be required for these Committees to complete their work properly.

The May 17, 1988 deadline imposed by the Commission for the ATS-AC to submit an "Interim Report" addressing ATV spectrum requirements is, in NAB's opinion, unrealistic for its goals. An anecdote indicating this point comes from the January 12, 1988 meeting of the ATS-AC Planning Subcommittee Working Party 3 - ATS Spectrum Utilization and Alternatives, which is studying various spectrum scenarios and computer simulation models. There, a representative of NTIA related that it would take about two months to modify the best existing software program to the Working Party's needs and that each "run" would likely require one week of continuous processing time. Since the input parameters for such a program are not yet known (eg., protection ratios, augmentation channel bandwidths, contiguous or non-contiguous spectrum, etc.), it is obvious that whatever spectrum requirements that could be identified by the Interim Report date would be speculative at best.

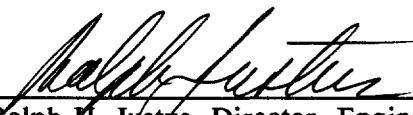
NAB shares the Commission's desire to narrow the ATV spectrum options from the infinite to the possible. In our view, however, substantive and critical assessments of those options are premature at this time, as they will still be for May 17th. NAB urges the Commission to afford the industry "machinery" already in place and working sufficient time to complete its studies of these issues, in a well-reasoned and substantive manner. Only then can we provide the Commission with accurate, meaningful data so that it can then make informed spectrum judgments.

III. OTHER ISSUES RAISED IN COMMENTS CAN BEST BE ADDRESSED IN SEPARATE, NARROWLY-FOCUSED FUTURE STAGES OF THIS PROCEEDING.

Many of the other issues raised in the Notice and addressed by commenting parties, while important, can be considered at this time secondary to the issues of ATV system standards, performance and spectrum requirements.³ These issues include the UHF "Taboos", proposed "flexible" spectrum use, proposed relaxation of the NTSC standards, etc. NAB encourages the Commission to set separate stages during the course of this proceeding so that these issues can receive the attention they deserve through narrowly-focused comments and reply comments. There is no apparent need to resolve these issues sooner than others, and the Commission decision-making will only benefit from more substantive and specific information. To this end, NAB joins with MST and NCTA in filing Joint Reply Comments in this proceeding suggesting an ordered structure for future Commission actions.

Respectfully submitted,

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of Counsel

January 19, 1988

³See, in particular, Comments of the National Telecommunications and Information Administration at 8, and Zenith Electronics Corporation at 9-18.

See Comments of:

APPENDIX A

Corporation for Public Broadcasting at 17-21

Capital Cities/ABC, Inc. at 3-5

North American Philips Corporation at 29-30,49-52

National Cable Television Association, Inc. at
iv, 4-7,11-12,15

CBS, Inc. at 24-36

Association of Independent Television Stations Inc.,at 3-5

National Broadcasting Company, Inc. at 11-18

Advanced Television Systems Committee at 12-13

Association of Maximum Service Telecasters at 32-53

David Sarnoff Research Center at 2

New York Institute of Technology at 12

Rogers Cablesystems of America, Inc. at 5

North American Philips Corporation at 30

Scripps Howard Broadcasting Company at 2

Chronicle Broadcasting Co. at 2

King Broadcasting Company at 2

Metrovision, Inc. at 3

American Family Broadcast Group, Inc. at 8

Tribune Broadcasting Company at 2,7

General Instrument Corporation at 10

Viacom International Inc. at 5

Appendix A (cont)

Scientific-Atlanta at 4

William F. Schreiber at 2-5

W. Russell Neuman at 5

Time Incorporated at 20

**Great American Broadcasting Co., McGraw Hill,
Broadcasting Company, Inc. and the New York
Times Company at 4**

Meredith Corporation at 2

Bonneville International Corporation at 2,3-5

Zenith Electronics Corporation at 21

Land Mobile Communications Council, Appendix A at 5

Motion Picture Association of America, Inc. at 7

Fisher Broadcasting Inc. at 4

**Cosmos Broadcasting Corporation and H & C
Communications Inc. at 4**

Cox Enterprises, Inc. at 12-17

Pulitzer Broadcasting Company at 5-6

Matsushita Electrical Corporation of America at 12-14

Certificate of Service

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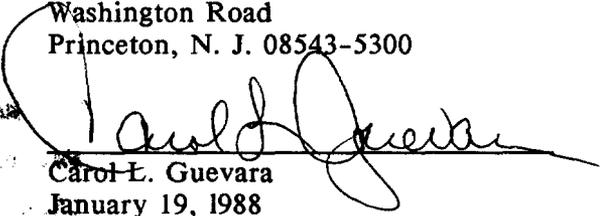
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