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PACIFIC * TELESIS..
Group - Washington

November 30, 1988

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NOV 30 1988

Federal Communications Commission
Office of the Secretary

Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Dear Ms. Searcy:

Re: MM Docket 87-268

On behalf of Pacific Bell and Nevada Bell, please find enclosed an original and six copies of their "Comments" in the above proceeding.

Please stamp and return one copy to confirm your receipt. Please contact me should you have any questions concerning this matter.

Sincerely,

William F. Adler

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Enclosures 7

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

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NOV 30 1988

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

COMMENTS OF PACIFIC BELL AND NEVADA BELL

Pacific Bell and Nevada Bell, ("the Pacific Companies") submit these comments in response to the Tentative Decision and Further Notice of Inquiry in the above-captioned proceeding released on September 1, 1988.¹

¹ 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, Tentative Decision and Further Notice of Inquiry, Released on September 1, 1988.

I. Introduction

In this proceeding the Commission seeks comments on the need for standards and the type of standards for Advanced Televisions ("ATV") Systems. Telephone networks are undergoing fundamental changes. In the next decade there will be a shift toward a broadband ISDN environment capable of carrying information, including uncompressed high quality video signals at high speed and low cost. Consequently, the telephone network promises to provide one of the many potential transmission mediums for ATV. The Pacific Companies urge the Commission to provide consumers as many choices as feasible by encouraging the development of ATV in a broad spectrum of transmission mediums in its standard setting process.

As the Commission noted in its Introduction, the challenge is "to design and implement a framework for the next generation of broadcasting that will promote efficient realization and wide dissemination of the benefits of this new technology, yet also will permit incorporation of future technological improvements in a timely and efficient manner."²

² Id. at para. 2.

The Pacific Companies concur with the Commission's tentative conclusion that the public will benefit if existing broadcasters are permitted to implement ATV. The Pacific Companies further support the adoption of a spectrum allocation plan that is "backwards compatible" with the standard established by the National Television Standards Committee ("NTSC") so that consumers with existing television sets are not disadvantaged in the transition to ATV. The spectrum allocation plan and a standard for the delivery of terrestrial broadcast signals should be developed and finalized as soon as possible to provide the necessary guidance to interested parties. However, adoption of a transmission standard for terrestrial broadcasting alone does not serve the public interest.

II. The Consumer Will Benefit From The Development of Different Transmission Mediums.

Cable, fiber optics, direct broadcast satellite, microwave, VCRs and terrestrial broadcasting are all mediums capable of delivering ATV. Each delivery medium is characterized by unique advantages and disadvantages and can offer a variety of capabilities when used in the transmission of ATV signals. Each has something unique to contribute to the development of ATV technology.

The Pacific Companies are encouraged by the Commission's recognition that it is not in the public interest to retard the independent introduction of ATV through different technologies, and its sensitivity to benefits of compatibility between equipment associated with various video delivery methods.³ This view suggests a recognition that VCRs and other delivery technologies (such as cable, DBS, etc.) do not have the same technological constraints of spectrum-dependent terrestrial broadcast. This view also suggests a recognition that initial application of ATV may occur in commercial and industrial settings, such as flight simulations, medical uses, etc. In those settings there may be a greater need for higher quality than in the entertainment use of ATV in homes. The advances in ATV technology initially developed as a result of research directed to commercial and industrial uses will most likely also be of value in the home video market. For instance, high-quality video resolution could be useful in new information service applications such as medical diagnoses or security inspection in home emergencies. ATV technology may also enhance and broaden educational opportunities to more people in disciplines such as art and science where true-to-life video image is necessary to substitute in-class instruction. Consideration should be given to the public's potential opportunity to acquire high-quality ATV

³ Id. at para. 4.

service not only for recreational use but also for other intelligent home applications.

Absent some policy requiring flexibility within home receivers, consumers may be forced to purchase separate receivers compatible with each medium for delivery. The Pacific Companies believe that the Commission can avoid this undesirable result and meet its objective of not retarding the independent introduction of ATV by non-broadcast mediums by adopting an interface standard.

III. Consumers Are Best Served by An Interface Standard.

The Pacific Companies urge the Commission to adopt an interface standard in conjunction with the transmission standard for delivery of broadcast signals. An interface standard defines the interface between the transmission medium and the receiver and would accept any signal within a specified parameter. The parameter would encompass signals with bandwidth and performance characteristics up to limits envisioned by the most dynamic delivery medium. The parameter would also provide for the most constrained signal formats, notably those signals delivered within a 6 Mhz base bandwidth.

The signal processing capabilities in the interface device would likely add relatively small additional costs to the receiver, while greatly expanding its potential applications. As the telecommunications and television industries continue to merge, new applications for the television receiver may encompass not only video transmission, but other computing functions. Commission leadership is needed to realize the full potential of ATV, in both its primary and secondary markets.

The standard for the interface between the ATV receiver and the delivery medium should be developed by the appropriate industry bodies for final approval by the Commission. The result would be a standard that permits one receiver to display transmissions from direct broadcast satellite, fiber optics, microwave, VCRs, coaxial cable, and terrestrial broadcasting at the highest level of quality for each medium.

There are several advantages to adopting an interface standard along with a transmission standard for broadcast signals. The interface standard would promote competition in the telecommunications industry by encouraging a broader range of participants. The consumer would benefit from the developments in quality that such competition would produce. Competition rather than a technical limitation would determine the ultimate quality of the signal. Of equal importance, the consumer would not be forced to purchase multiple receivers to take advantage of

different transmission mediums or be limited to only one medium. Moreover, with an interface standard the transmission medium would be transparent to the consumer.

In the absence of an interface standard the consumer will simply not be able to take advantage of improvements in transmission quality and evolving service applications. All signals would have to be transmitted to the consumer within the constraints of one transmission standard in which quality was frozen at an artificial level. As noted before, the alternative for the consumer would be to purchase multiple receivers. That alternative is certainly more costly than the relatively small cost associated with one receiver equipped to accept multiple transmission mediums through the interface standard.

IV. Conclusion

The Pacific Companies strongly support the Commission's desire to avoid standards that "may reduce consumer choice and prevent timely introduction of new technology".⁴ Consequently, we urge the adoption of an interface standard through industry alliance and cooperation, in addition to a standard for

⁴ Id. at para. 115.

terrestrial broadcasting. The interface standard will encourage the development of the ATV technology to its full potential. It will promote competition by encouraging participation by many related industries. Finally, the consumer will benefit from a standard that has the flexibility to promote the continued quest for quality.

Respectfully submitted,

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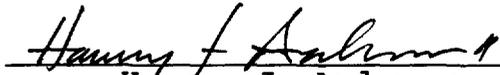
Their Attorneys

Date: November 30, 1988

CERTIFICATE OF SERVICE

I, Harvey J. Anderson, hereby certify that copies of the foregoing "COMMENTS OF PACIFIC BELL AND NEVADA BELL were served by hand or by first-class United States mail, postage prepaid, upon the parties on the service list below this 30th day of November, 1988.

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