

COMMENTS OF SMITH AND FISHER, LLC, IN THE FCC'S JOINT PETITION FOR
RULEMAKING OF AMERICA'S PUBLIC TELEVISION STATIONS AND THE NATIONAL
ASSOCIATION OF BROADCASTERS SEEKING TO AMEND SECTION 73.626 OF THE
COMMISSION'S RULES RELATING TO DISTRIBUTED TRANSMISSION SYSTEMS GN
DOCKET NO. 16-142 (DA 19-1036, released October 11, 2019)

The firm of Smith and Fisher, LLC, hereby submits comments in favor of the above-referenced Joint Petition for Rulemaking, which requests a change in the methodology the Commission uses to determine the limit of service for distributed transmission systems (DTS) proposals in Section 73.626 of the FCC's Rules.

As stated in the Petition, use of a reference full-power digital television station's interference-based 36 dBu F(50,10) contour as the defining limit within which a single frequency network facility (SFN) could be deployed, rather than it's noise-limited F(50, 90) service contour under the present Rules, would certainly improve a station's ability to provide service throughout its coverage area, improve mobile reception of the television signal and improve spectrum efficiency by reducing the requirement to use alternate-channel translators). This change will inevitably enhance the rollout of the Next Gen TV standard, known as ATSC 3.0.

For these reasons, we support the adoption of the proposed changes to Section 73.626 of the FCC's Rules with regard to DTS facilities.



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