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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	)	
Amendment of the Rules	)	MM Docket No. 92-305
Relating to Permissible Uses	)	
of the Vertical Blanking	)	
Interval of Broadcast Television	)	
Signals	)	

COMMENTS OF ASSOCIATION FOR  
MAXIMUM SERVICE TELEVISION, INC.

The Association for Maximum Service Television, Inc. ("MSTV") hereby files comments to the Notice of Proposed Rule Making, MM Docket No. 92-305, released in the above captioned docket on December 31, 1992 ("Notice").<sup>1/</sup>

SUMMARY

MSTV strongly endorses ATSC's proposal to reserve line 19 of the vertical blanking interval for a ghost cancelling reference signals generally and the Phillips GCR signal in particular. MSTV also supports the proposal to assign line 21, field 2 of the vertical blanking interval for enhanced closed captioning services.

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<sup>1/</sup> MSTV is a trade association of approximately 250 local broadcast television stations committed to achieving the highest technical quality feasible for the local broadcast system.

I. RESERVATION OF LINE 19 FOR A GHOST CANCELLING REFERENCE SIGNAL WILL ENHANCE THE QUALITY OF TELEVISION RECEPTION

The ATSC's proposal to reserve line 19 for a ghost cancelling reference ("GCR") signal is sound and should be adopted. The Notice is surely correct in observing that, although substantial improvements in the quality of television reception have occurred over time, ghosting "may be the most significant defect yet to be eliminated or minimized."

Notice, at ¶ 13.<sup>2/</sup> Reserving line 19 of the vertical blanking interval for a GCR signal constitutes a significant and substantial step toward resolving this vexing and long-standing problem. Moreover, given that vertical interval reference signal circuitry is generally unavailable,<sup>3/</sup> the reallocation of line 19 represents an efficient use of the limited capacity in the vertical blanking interval.

As the Commission is aware, the ATSC proposal is the result of years of work and field study.<sup>4/</sup> In light of the extensive cooperative efforts by the electronics industry, broadcasters, and ATSC in successfully addressing the problem

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<sup>2/</sup> See also "NTSC Ghost-Zapping Tests Begin This Month," Broadcasting, Sept. 2, 1991, at 30.

<sup>3/</sup> See Comments of MSTV, RM-8067, at 5 (Sept. 28, 1992) ("Comments"); see also In the Matter of Suspension of Section 73.682(a)(21)(iv) of the Commission's Rules, 7 FCC Rcd. 7158, 7158 (1992).

<sup>4/</sup> See Comments, at 1-4 (setting forth the history of MSTV's and ATSC's work on resolving the problem of ghosting).

of ghosting,<sup>5/</sup> the tentative decision to reserve Line 19 for this purpose is clearly a sound one.

The Notice also seeks comment on whether the Commission should follow the course set with respect to television stereo sound in reserving Line 19 solely for GCR signals which meet the specifications of the Philips Laboratory signal. The Notice queries specifically whether this action would hinder or preclude future improvements in ghost cancelling systems. Notice, at ¶ 15.

MSTV believes that adopting a single standard is essential to providing a genuine and universally available solution to the problem of ghosting. The Philips GCR signal has proven to be the best through rigorous laboratory and field testing.<sup>6/</sup> Moreover, MSTV believes the Commission should restrict the use of Line 19 to the Philips system GCR signal. The possibility of multiple ghost cancelling systems will likely result in a slower implementation program, as electronics manufacturers and broadcasters remain uncertain as to the eventual system-selection outcome. Adoption of the Philips GCR signal would provide both the best quality ghost

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<sup>5/</sup> See Communications Daily, Aug. 17, 1992, at 5.

<sup>6/</sup> Comments at 4-5; NAB/MSTV, "Laboratory and Field Tests of Philips, Sarnoff/Thomson and Hybrid Philips/Sarnoff/Thomson Ghost Cancelling Systems for NTSC Television Broadcasting" (June 18, 1992).

cancelling function available and the most expeditious implementation schedule.

II. THE COMMISSION SHOULD APPROVE THE USE OF LINE 21, FIELD 2 OF THE VERTICAL BLANKING INTERVAL FOR IMPROVEMENTS IN CLOSED CAPTIONING SERVICES

The Notice also seeks comment on the Consumer Electronics Group of the Electronic Industries Associations' ("CEG") proposal to allocate line 21, field 2 of the vertical blanking interval for improved closed captioning services. As a general proposition, MSTV supports this proposal.

MSTV is committed to achieving the highest possible broadcast quality for all television viewers. Obviously, closed captioning services are of critical importance to many television viewers and should be supported in the absence of any evidence that such improvements otherwise would jeopardize television broadcast quality. CEG's proposal for the use of line 21, field 2 appears to present an opportunity for the Commission to improve broadcast quality for those viewers who rely on closed captioning services without causing any undesirable side effects. Consequently, MSTV supports the use of line 21, field 2 for enhanced closed captioning services. However, before reassigning line 21, field 2, the Commission should determine the extent to which interference to line 22 is probable, and whether it can be avoided. See Notice, at ¶ 11.

The vertical blanking interval does not contain unlimited capacity, and it is difficult to predict with certainty when new technologies will appear that allow for the further improvement of broadcast quality. Consequently, space within the vertical blanking interval should be used as efficiently as possible, thus allowing for the accommodation of future improvements.<sup>2/</sup>

Finally, MSTV supports the National Captioning Institute's proposed definitions and use restrictions for line 21, field 2. Although space within the vertical blanking interval should not be used inefficiently, secondary uses of line 21, field 2 should not be allowed to displace the provision of improved captioning services. Designating "captioning" and "text" services as the primary uses for line 21, field 2 while permitting the secondary use of line 21, field 2 for "external data service information" will help ensure that line 21, field 2 is used primarily for enhanced closed captioning services without precluding the use of line 21, field 2 for other useful purposes compatible with the line's primary function.

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<sup>2/</sup> The efficient use of the space within the vertical blanking interval should be one of the Commission's guiding principles when evaluating proposals for the use of such space. For example, the use of line 19 for a GCR signal will materially improve broadcast quality. In the absence of unused space within the vertical blanking interval, the accommodation of ghost cancelling would have to come at the expense of another service.

CONCLUSION

For the foregoing reasons, MSTV supports the proposed reallocation of line 19 for a GCR signal and line 21, field 2 for improvements to closed captioning services.

Respectfully submitted,

ASSOCIATION FOR MAXIMUM  
SERVICE TELEVISION, INC.

By: \_\_\_\_\_

Jonathan D. Blake  
Gregory M. Schmidt  
Ronald J. Krotoszynski, Jr.  
Covington & Burling  
1201 Pennsylvania Avenue, N.W.  
P.O. Box 7566  
Washington, D.C. 20044

Its Attorneys

Julian L. Shepard  
Vice President and General  
Counsel  
Victor Tawil  
Vice President  
Association for Maximum  
Service Television, Inc.  
Suite 610  
1400 16th Street, N.W.  
Washington, D.C. 20036

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