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

FCC 92-556

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

REPLY COMMENTS OF ASSOCIATION FOR MAXIMUM SERVICE TELEVISION, INC.

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

There is unanimous agreement that line 19 of the vertical blanking interval should be reserved for a ghost cancelling reference ("GCR") signal. There is also complete agreement among the commenters that the Philips Laboratories GCR signal should be adopted as the current standard. ATSC recommended the Philips GCR signal only after extensive field work and testing. And, as the comments make clear, adoption of the Philips GCR signal will not preclude future improvements in ghost cancelling technologies. The Philips

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1/ 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.

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GCR signal is clearly the best available system,[2] and it should be adopted as the current standard.

Capital Cities/ABC, Inc. ("Capital Cities") and the National Association of Broadcasters ("NAB") both note that some broadcasters use a vertical interval reference (VIR) signal incident to their broadcast transmission operations.[3] The reservation of line 19 for a GCR signal will obviously preclude these broadcasters from continuing to use line 19 for a VIR signal.

MSTV endorses the Capital Cities solution to this problem,[4] and urges the Commission to authorize the use of lines 10 to 16 for a VIR signal. MSTV also recommends that such use of lines 10 to 16 not be subject to prior Commission notification and approval.

Finally, MSTV notes that the issue of whether to promulgate definitions of "captions," "text," and "extended data services" generated differing views among the commenters. Some commenters, including MSTV and NAB, had no objection to the proposed definitions. However, other commenters proferred

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[2] 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).

[3] Comments of the National Association of Broadcasters, MM Docket 92-305, at 7 (March 1, 1993); Comments of Capital Cities/ABC Inc., MM Docket 92-305, at 3-4 (March 1, 1993).

[4] Comments of Capital Cities, at 3-4.

somewhat different definitions,[5] and still others opined that defining these terms could serve to constrain flexibility in service offerings in a way which could inhibit development.[6]

Although MSTV believes it possible to develop definitions which would not impair the growth of these services, it agrees that there is no apparent reason at this early juncture to risk doing so. Accordingly, the Commission may wish to defer the promulgation of these definitions until

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[5] See, e.g., Comments of the National Captioning Institute, MM Docket No. 92-305 at 3, 7 (March 1, 1993).

[6] See, e.g., Comments of EEG Enterprises, Inc., MM Docket No. 92-305, at 3 (March 1, 1993).

the market for these services has matured and/or there is some indication that it would otherwise be desirable to do so.

Respectfully submitted,

ASSOCIATION FOR MAXIMUM
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