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

In Re:	
The Impact of Advanced Television Technologies on Local Television Broadcasting	RM-5811

COMMENTS OF THE CORPORATION FOR PUBLIC BROADCASTING, THE NATIONAL ASSOCIATION OF PUBLIC TELEVISION STATIONS, AND THE PUBLIC BROADCASTING SERVICE

The Corporation for Public Broadcasting ("CPB"), the National Association of Public Television Stations ("NAPTS") and the Public Broadcasting Service ("PBS") submit these Comments in response to the Commission's Public Notice in the above-captioned proceeding, Report No. 1650, released March 27, 1987.

CPB is the private, nonprofit corporation authorized by the Public Broadcasting Act of 1967 and financed primarily by Federal appropriations to facilitate and promote a nationwide system of public broadcasting. NAPTS and PBS are nonprofit membership organizations, whose members are licensees of virtually all of the nation's public television stations. NAPTS serves as the national representative of these sta-

tions, presenting their views and participating in proceedings before Congress, executive and administrative agencies, and in other activities. PBS distributes national programming and other program-related services to the nation's public television stations.

The Commission's Notice requests comments on the Petition for Notice of Inquiry and the Petition for Special Relief filed by the Association of Maximum Service Telecasters and others (collectively referred to herein as "AMST"). In those Petitions, AMST requests that the Commission institute an inquiry into the potential impact of high definition television ("HDTV") and other advanced television technologies on the nation's universal local television service. AMST is concerned that these new technologies may jeopardize the vitality of the nation's over-the-air television stations because many of them require more than the 6 MHz of spectrum allocated to broadcast television and therefore local television stations may be unable to employ them. AMST asserts that an inquiry into HDTV and other new technologies would allow the Commission to make a reasoned determination as to the effect of HDTV on the nation's free television broadcast system, the magnitude of the problems broadcasters face in seeking to provide HDTV, and the appropriate Commission response.

AMST also requests that, during the pendency of the inquiry, the Commission, inter alia, postpone consideration of its proposals in Docket No. 85-172. In that Docket, the Commission proposes to allow land mobile radio to use additional UHF spectrum in a number of major television markets and to reduce the level of protection television stations receive against interference from land mobile radio transmitters. According to AMST, adoption of these proposals would preclude the use of the UHF band for HDTV, particularly in the major metropolitan areas where there is little remaining available UHF spectrum.

CPB, NAPTS, and PBS urge the Commission to adopt AMST's suggestion and to institute an inquiry concerning HDTV and other advanced television technologies.[1/] They also support AMST's proposal that the Commission refrain from allocating any more UHF spectrum to land mobile radio services while the inquiry is proceeding, lest the Commission foreclose broadcasters from offering HDTV by depriving them of needed spectrum.

Public broadcasting is extremely interested in HDTV and other new technologies that would improve the quality of the television signal. Those technologies have significant

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1/ AMST's Petitions also propose a broad range of regulatory approaches the Commission might take with respect to HDTV. The support of CPB, NAPTS and PBS for an inquiry into HDTV and to defer action in Docket No. 85-172 should not be construed as support for all of AMST's suggestions; in fact, CPB, NAPTS and PBS oppose some of those proposals.

potential for enhancing viewer enjoyment of the cultural, educational, and instructional programming offered by local public television stations. Indeed, much of the cultural and instructional programs provided by public television would uniquely benefit from HDTV and similar advances.

Moreover, public television's use of these technologies would be consistent with its mandate to provide high quality, diverse, creative and innovative program services. See 47 U.S.C. § 396(g)(1)(A). Public television has long been a pioneer in developing and using new technologies to enhance its programming services. For example, public television instituted the nation's first satellite program distribution system, was instrumental in developing closed captioning for the hearing-impaired, and was the first to offer stereophonic television programming, using the DATE System[2/] for the distribution of stereophonic sound that could be simulcast by FM stations in cooperation with local public television stations. In addition, public television has been actively involved in the development and deployment of stereo transmission of television stations without the use of simulcasting FM stations.

2/ DATE stands for Digital Audio for Television -- a four-channel, digitally encoded system of transmitting high-fidelity stereo audio signals to public television stations via satellite.

Consistent with this historical interest in new technologies, public television has been exploring the use of advanced television technologies, such as HDTV, to enhance the quality of its program services. Largely for the reasons set forth in AMST's Petitions, CPB, NAPTS and PBS are concerned whether sufficient spectrum will be available for local television stations interested in using HDTV. They are also concerned that, if alternative distribution systems can provide HDTV while public broadcasters can not, there will be a migration of public television's viewers to these alternative services. The loss of the financial support of those viewers could affect public television's ability to provide the quality programs it now offers. And, since most of the alternative distribution systems that may offer HDTV are likely to be pay services, diminishing public television's ability to continue providing that programming may deprive those who are unable to afford pay television services of access to these educational and cultural services altogether. Thus, CPB, NAPTS and PBS believe that the public interest will be served if the Commission institutes an inquiry concerning the availability of HDTV to local broadcasters, including local public television stations.

Institution of such an inquiry is not, however, enough. It is clear that, unless technology advances will

permit HDTV to be transmitted over the 6 MHz to allocated over-the-air television, finding the additional spectrum for broadcast of the service will be difficult. The likely source of additional spectrum for broadcasters lies in the UHF band. If, as proposed in Docket No. 85-172, additional UHF spectrum is reallocated to land mobile radio services now, the use of the UHF band for HDTV may well be precluded, particularly in the larger markets where spectrum is particularly scarce.

Consequently, CPB, NAPTS and PBS urge the Commission to refrain from allocating any UHF spectrum to non-broadcast users while it completes the inquiry. Once the inquiry has been concluded, the Commission will be able to make a more reasoned and informed determination whether the public interest would be better served by making additional UHF spectrum available to land mobile radio services or by preserving such spectrum for use by local public television stations and other broadcasters for HDTV or other broadcast services. Absent such a deferral, the erosion of the UHF television band may make it technically infeasible for local public television stations to provide HDTV, regardless of the wishes

of viewers to receive it, local public television stations to provide it, and a Commission finding that its provision would serve the public interest.

Respectfully submitted,

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June 10, 1987

CERTIFICATE OF SERVICE

I, Cynthia Y. Tillar, do hereby certify that I have on this 10th day of June, 1987 caused copies of the foregoing "Comments Of The Corporation For Public Broadcasting, The National Association Of Public Television Stations, And The Public Broadcasting Service" to be served by first class United States mail, postage prepaid to the parties on the attached service list.

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