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Federal Communications Commission
Office of the Secretary

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

In the Matter of	)	
	)	
Advanced Television Systems and Their Impact on the Existing Broadcast Service	)	MM Docket No. 87-268
	)	
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 the Commission's Rules	)	

INITIAL COMMENTS OF POST-NEWSWEEK STATIONS

Post-Newsweek Stations, Inc. ("Post-Newsweek")[1/] hereby submits its initial comments on the Commission's Notice of Inquiry on Advanced Television Systems ("NOI"), 2 FCC Rcd. 5125 (1987).

Post-Newsweek believes that the implementation of advanced television ("ATV") technologies by local broadcasters is the most important issue currently facing local broadcasters. Post-Newsweek strongly endorses the Commission's decision to initiate this inquiry in response to the Petition filed by MST, NAB, Post-Newsweek and 55 other

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1/ WFSB(TV), Hartford, Conn., WJXT(TV), Jacksonville, Florida, WPLG(TV), Miami, Florida, WDIV(TV), Detroit, Michigan.

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broadcast companies and organizations. Petition for Notice of Inquiry (filed February 13, 1987). It also commends the Commission's decision to establish a blue-ribbon Advisory Committee to address these crucial issues.

Post-Newsweek believes it is essential that the Commission take whatever steps are necessary to ensure that local broadcasters will have the ability to implement ATV systems that will be competitive with those available to other video delivery services. It is important that, if at all possible, the ATV system implemented be compatible with the 196 million receivers already in use, compatible with local broadcasters' existing 6 MHz channels, and compatible with the present system of assignments. The effort to evaluate and analyze ATV systems which is already underway should provide answers to the questions presented in the NOI and the relative advantages of proposed systems in terms of picture quality, spectrum use, compatibility, practicality and implementation costs.

Post-Newsweek concurs in the Commission's assessment that the spectrum needs and allocations issues are of paramount importance and must be resolved as expeditiously as possible. Local broadcasters must develop and implement a competitive ATV system in a time frame comparable to that of their non-broadcast competitors, who now expect to enter the home video market as early as 1990. And if ATV augmentation spectrum is needed, the Commission

must act quickly to secure it before it is irretrievably committed to other uses. Post-Newsweek also recognizes that it would be irresponsible of the Commission to reserve indefinitely large amounts of spectrum on the mere possibility that some part of that spectrum might at some far distant future time be of some indeterminate importance to broadcasting.

Yet, as will be demonstrated in the comments of MST and NAB, in which Post-Newsweek joins, the underlying and unavoidable evaluative process cannot and should not be conducted with indiscriminate haste. For this reason, Post-Newsweek believes that the Commission should view with great caution the Advisory Committee's initial recommendations to the Commission on the "spectrum needs" of broadcast ATV systems. These recommendations, which the Commission has stated must be filed by May 17, 1987, of necessity will be based on information already in hand and that which will be generated in the next four to five months. The Advisory Committee undoubtedly will make every effort to organize and analyze the data in the most useful manner and this initial report may prove useful in catalyzing the development of a useful analytical structure for the Committee's deliberations. But the fact is that none of the significant and interdependent evaluative stages will have been progressed during this time period to the point where they would provide a sound basis for major

spectrum allocation decisions such as "thawing" the current freeze of UHF spectrum.

Both the industry and the Commission must move quickly. Above all, however, they must move in the right direction.

Respectfully submitted,

POST-NEWSWEEK STATIONS, INC.

By: _____
Gregory M. Schmidt
Michael E. Tankersley

Covington & Burling
1201 Pennsylvania Ave., N.W.
P.O. Box 7566
Washington, D.C. 20044
(202) 662-6000

Its Attorneys

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