

B. Conversion Deadline

The Commission has tentatively concluded that it will establish a specific target date for complete conversion of the local broadcast system to HDTV and requests comment on a proposed deadline of 15 years from the latter of the selection of an HDTV broadcast transmission standard or the adoption of a final Table of Allotments. On this date, broadcasters will be required to surrender their reversion channels and cease broadcasting in NTSC. Further Notice at ¶¶ 50, 53.

Broadcasters as a group take no position on the appropriateness of the specific 15-year proposal, except to emphasize once again that adoption of any specific period at this early juncture in HDTV development must inevitably be based on extremely crude speculation as to the likely availability and pricing of HDTV receiver and downconversion equipment, HDTV production and transmission equipment and HDTV programming. It is undeniable that there are extraordinarily wide variations in the estimates of expert parties as to the likely rate at which HDTV will overtake NTSC. Further Notice at ¶¶ 52, 55; MSTV Reply Comments at 12.^{14/} The only

^{14/} The Further Notice cites an early CBS cost study for the proposition that the last group of broadcasters will "complete studio implementation in nine years". Further Notice at ¶ 53, n. 156. This is incorrect. The CBS Study did not make any "finding" as to when broadcasters would complete studio construction, it simply hypothesized, based on preliminary analysis of capital investment, marketplace and competitive considerations, that the last broadcast stations would

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relatively noncontroversial empirical assumption recited in the Further Notice is the conclusion that 15 years will permit full depreciation of NTSC consumer equipment purchased prior to the introduction of HDTV. This modest assumption fails to deal at all with the many NTSC receivers which undoubtedly will be purchased for a significant period of time after the introduction of HDTV, a number which is in turn dependent upon such unknowable factors as the cost and relative availability of HDTV receivers and programming. The bottom line remains that any "clearly defined planning horizon" for conversion adopted at this point runs a substantial risk of proving to be not only unrealistic but counterproductive.

Broadcasters thus applaud and view as absolutely essential the Commission's proposal to review in 1998, five years after the adoption of an HDTV standard and table of allotments/assignments, the propriety of any conversion deadline which may be established now. By that date, the Commission should have a much more realistic and accurate assessment of the factors critical to adopting a rational conversion timetable and will still be able to take action in a timeframe which will not unduly frustrate the Commission's ability to maximize the efficient use of this spectrum.

^{14/}(...continued)

complete studio implementation nine years after the initial group and that the initial group would take five years to implement studio conversion. High Definition Television Transition Scenario for TV Stations: A CBS Work-In Progress at 14-15 (February 20, 1991).

C. Simulcasting

The Further Notice proposes to adopt a requirement that broadcasters "simulcast" 100% of their programming on their NTSC and HDTV channels no later than four years after the conclusion of the initial five-year application/construction period. Further Notice at ¶¶ 58-67. It suggests and seeks comment upon on a variety of possible timetables and implementation approaches, ranging from 100% simulcast as soon after the five-year application/construction period as the necessary production and conversion equipment is available to 50% within two years and 100% within four years after the five-year application/construction period.

For the same basic reasons arguing against adoption of a fixed conversion period at this time, Broadcasters continue to believe it inappropriate to set a fixed schedule for simulcasting at this juncture. Adopting an inappropriately rigid or accelerated simulcasting timetable runs the risk of substantially hindering station flexibility and inhibiting the timely and effective development of HDTV programming efforts. Joint Comments II at 28-30. The effectiveness of a simulcasting requirement in meeting the Commission's policy objectives will be crucially affected by the availability of consumer home receivers, professional station equipment and programming. Rigid simulcasting timetables could well also needlessly impinge upon important diversity concerns. Broadcasters recommend that the

Commission defer judgment on a simulcasting timetable and, in any event, declare that along with the reassessment of its conversion deadline it will also revisit this issue in 1998.

Whatever simulcasting regulation is ultimately decided, Broadcasters strongly support the Commission's assessment that maximum flexibility is appropriate early in the implementation process and that any simulcasting requirement be phased in over a period of time. Similarly, Broadcasters continue to believe that the Commission should define "simulcast" to permit substantial flexibility both in the time of airing and the material included in the simulcast programs. Further Notice at ¶ 64; Joint Comments II at 30-31. Broadcasters still believe it reasonable to define "same time" at which simulcast programs are required to air as the same 24-hour period, and to define "same program" as a program which has as its basis the same underlying material. Broadcasters also fully endorse the Commission's proposal to define "program" to exclude commercials and promotions and other programming of short duration but do not believe it is necessary at this point to define a specific minimum program length. Further Notice at ¶ 64.

These realistic definitions of "simulcast" will help give broadcasters flexibility to explore the full potential of HDTV and take full advantage of this new technology. They will not, however, ensure sufficient flexibility so as to obviate the need for a phase-in of the simulcasting

requirement. Further Notice at ¶ 64. At least in the early days of HDTV implementation, a station should be free to experiment with the new HDTV marketplace, to take full advantage of HDTV production values, and to promote the availability and uniqueness of HDTV.

D. The Dual Network Rule

The Further Notice broaches the question of whether the Commission should suspend the dual network prohibition, 47 C.F.R. § 73.658(g), to permit the networks to provide their NTSC affiliates a second feed for their HDTV channels or, in the event an NTSC affiliate fails to obtain or utilize an HDTV channel, provide an HDTV feed to another station in the same market. Further Notice at 19. As with the temporary relaxation of the multiple ownership rules, Further Notice at ¶ 17, these proposals appear to be appropriate and necessary steps in the transition to HDTV.

E. Conversion of Translators and LPTVs to HDTV

The Further Notice proposes to require LPTVs to broadcast in HDTV no later than the time full-serve stations are required to convert. Id. at ¶ 44. Broadcasters, too, see no reason why LPTV stations would be treated differently in this respect. They would note, however, that this conversion should be permitted to take place only after sufficient information is gained concerning the real-world propagation and interference characteristics of broadcasters' HDTV signals. Such information is an essential underpinning to the

requisite showing that proposed LPTV or translator HDTV operations will cause no harmful interference to any full-service co- or adjacent-channel HDTV or NTSC operations, in accordance with the secondary status LPTV and translator stations would retain after converting to HDTV.

Notwithstanding the Further Notice's rejection of this suggestion, at ¶ 41, Broadcasters continue to urge the Commission to give displacement priority to translator stations. Translator stations are in many instances providing essential service to underserved areas. They will benefit not only from the resources but the experience of the parent station and, in many instances, are essential to the viability of the parent station.

F. ATV System Developments and Documentation

The Further Notice seeks comment on the ATV Advisory Committee's finding that while there are a number of techniques, still in the developmental stage, for the compression of video signals, none is sufficiently concrete to be tested contemporaneously with the five proponent systems now being judged. Id. at ¶ 80. Broadcasters fully support the vital role the Advisory Committee has played, and agree that there is currently no need to reopen the testing process.

Broadcasters also support the Commission's decision, at the recommendation of the United States Advanced Television Systems Committee ("ATSC"), to have the Advisory Committee address recent advances in multi-channel audio coding

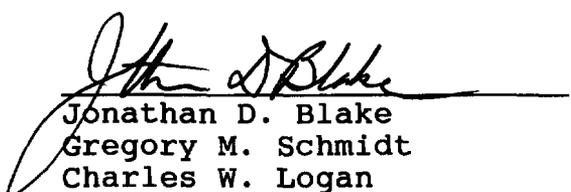
technology and the ability of the five proponent systems to adapt to future developments in this area. The Commission is correct in its observation that ATSC's recommendation offers "a practical means of achieving extensibility in the audio component of an ATV system selected as a standard." Further Notice at ¶ 78-79.

Finally, Broadcasters also agree with the early filed comments of ATSC regarding the designation of standards-setting groups to document the technical specifications of the winning ATV system. Comments of ATSC (filed June 5, 1992). The Commission recognizes in the Further Notice that "prompt disclosure of a winning system's technical specifications may be necessary to permit the mass production of ATV equipment in a timely fashion." Id. at ¶ 69. The ATSC along with the other groups identified in its comments are appropriate entities to play this critical role in documenting these specifications.

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