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December 19, 1991

Federal Communications Commission
919 M Street, N.W.
Room 222
Washington, DC 10554
ATTN: Ms. Donna R. Searcy

In the Matter of)
Advanced Television Systems)
and Their Impact upon the)
Existing Television Broadcast)
Service)

MM Docket No. 87-268
FCC 91-357
38266

NOTICE OF PROPOSED ROLE MAKING

Adopted: October 24, 1991 ; Released: November 8, 1991

Comment Date: December 20, 1991
Reply Comment Date: January 20, 1992

By the Commission: Chairman Sikes issuing a separate statement.

Dear Commissioners:

By way of introduction, Liberty Television, Inc. is a production company and I have been professionally involved in the business for nearly thirty years. Please see attached resumé.

Some three years ago, I became alarmed, after discovering that the Japanese-developed 1125/60 high definition production standard was technically outdated and inadequate, and undertook to become active in the standards-making process. As a result, I have joined with those who advocate a digitally-based advanced television system.

Why digital? From my production point of view, it is becoming apparent that market forces are pushing for nearly unlimited flexibility which will require the decoupling of the production, transmission and display components of any system that is developed. While this decoupling concept holds great promise for

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users and consumers, and therefore manufacturers, it will be necessary that certain considerations be made to assure that the captured image can gracefully transcend through the various layers of processing required by modern production to its ultimate destination, a display with a minimum of system-produced artifacts.

Digital processing is the only technical way of achieving these goals.

In order to maximize the need for flexibility, it is imperative for all systems designers to embrace the concept of harmonization between systems through the incorporation of interoperability, extensibility and scaleability.

Interoperability is particularly important to production. The over-the-air ATV broadcast standard you are currently determining will precipitate a corresponding studio standard. However, that standard will not be the only ATV production standard developed. Market forces will continue to push for ever higher resolutions to satisfy the needs of industries not associated with broadcasting, i.e., health care, industrial manufacturing, and defense. While, on the other hand, different industries are desirous of a digital system, but to achieve lower cost may opt for less resolution than the ATV broadcast standard, i.e., surveillance, video conferencing, some educational applications.

Therefore, designers of both the production standards contemplated and the transmission standards must be cognizant of the need to provide "hooks" (digital Headers and Descriptors) to facilitate graceful transitions from production to transmission so that broadcasters can not only fully participate and take advantage of all program sources, but provide virtually artifact-free pictures to their audiences.

Another reason to consider interoperability can be seen in the emerging need for a master or universal production standard for globally-distributed programming. It is likely that this universal standard will incorporate a higher level of resolution than any of the proponent standards being considered for U.S. broadcast purposes. It is not unreasonable to envision that eight years from now the Olympic Games will be produced using a progressively-scanned 72Hz standard with a resolution exceeding 2000 lines for purposes of providing very large public displays in coliseum or theatrical venues. In such real-time production, it will not only be required to down-convert, gracefully, to all existing standards, but also to up-convert, gracefully, from various lower (digital) ATV standards so as to provide live and historical background material originating from American, European and Asian production sites. All of this material will need to be fed back to the Olympic origination point for integration and retransmission

globally without any of the pictures originated by the sub-standards suffering impairments as a result of the process. Finally, consideration of designing interoperability into the transmission standard will facilitate the inclusion of extensibility and scaleability, two important features required to permit television stations to gracefully transition to higher and/or more advanced systems conveniently in the future.

The American effort to develop high definition television must include a commitment to a flexible standard, so as to allow television station operators to respond to market forces. We must not freeze the standard without any option for change, as was done with NTSC. Some people see the longevity of NTSC as a monument to worship. However, it is becoming clear that NTSC television broadcasting is trapped in an antiquated technology and cannot expand to incorporate desperately needed new markets that are being developed by more advanced systems, i.e., cable, fiber, computers, satellite, pay-per-view, and whatever new concepts lay just over the horizon. For the economic survivability of licensed stations broadcasting "free" television, flexibility must be provided. The concepts of interoperability, in association with scaleability, and extensibility will provide the stations the option to invest in developing important new markets.

I would like to state I believe the Commission has taken a strong leadership role in pointing the way towards an all digital flexible system and deserves to be recognized for this effort. I personally wish to extend my gratitude and respect for what it has achieved.

Thank you for your consideration.

Peace.


John V. Weaver
President

Encl: Resume

JOHN V. WEAVER

EXECUTIVE PRODUCER

In July of 1987 John folded his diverse activities into a new company, Liberty Television, Inc. This new venture's charter includes program development and original production for television's growing world market.

Orbis Communications, Inc. provided Liberty its first commission, to develop a program for a new marketing concept. The resultant show, "CHALLENGE," is a half-hour nature series featuring George Plimpton. Thirteen episodes were produced and syndicated starting January, 1988.

The success of that project led to a second commission by Orbis, "Horrible Night at the Movies." This tongue-in-cheek series features 13 of the worst movies ever made and is an outgrowth of John's work on "The Canned Film Festival." That Young & Rubicam, Dr. Pepper showcase was syndicated by LBS in 1986.

Prior to that, and in association with NewsVision, Inc., John brought the CBC produced "TOMMY HUNTER SHOW" to American television by way of the Nashville Network. This star-studded C & W musical variety show has been renewed for its fifth season.

With the future in mind, Liberty has made a major commitment to the developemnt of an American (H)DTV Production Standard. John's DTV activities include serving as consultant to the OTA and MCC and Stevens Institute of Technology. He is active in the MIT-HDTV Ad Hoc Group, attended the Columbia University Center for Telecommunications Research Symposium on HDTV, and was a panel member on the "BACK TO THE FUTURE" Workshop at the 1990 NATPE Convention and is a founding member of COHRS (Committee for Open High Resolution Systems).

Clients

J. Walter Thompson
The Family Channel
The Nashville Network
MCL Designs, Inc.
Young & Rubicam, Inc.
RJS Marketing
BELLCORE

"Comedy Shop"/"Gold Coast"
"U.S.A.M."
"Tommy Hunter Show"
"Pac Man"
"Canned Film Festival"
"P.W.T.W."/"All Star Wrestling"
FFF/Rep. Robert Roe, N.J.

Developed and/or Produced

Fast Forward to the Future
Thanksgiving Day Special
"Really Rosy"
"Fortune's Business" (Radio)
Challenge
Horrible Night at the Movies

Digital Television Report to Congress
NBC
CBS
FORTUNE MAGAZINE
ORBIS COMMUNICATIONS
ORBIS COMMUNICATIONS

Staff Positions

AMERICAN BROADCASTING CO.,
FOOTE, CONE, & BELDING
BLUE RIDGE ENTERPRISES INC.
KETCHUM COMMUNICATIONS, INC.
SYNDICATION NETWORK SALES

TV Network Station Relations;
Radio Network Sales Representative
TV Network Buyer
V.P. Program Development
V.P. Television and Radio Programming
President/Program Development

Consultant HDTV

OTA (Office of Technology Assessment), HDTV Report to Congress issued March 1990
MCC (Microelectronics and Computer Technology Corporation), HDTV First Cities Project
SIT (Stevens Inst. of Technology), Executive Committee of the Media & Information Technologies Initiative
IEEE (Institute of Electrical & Electronics Engineers), Digital Systems Information Exchange