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November 18, 1987

BY HAND

Mr. William J. Tricarico
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: MM Docket No. 87-268; Advanced Television Proceeding; Comments of Bonneville International Corporation

Dear Mr. Tricarico:

We hand you herewith, on behalf of Bonneville International Corporation, an original and eleven copies of its Comments in the above-referenced proceeding.

If you have any questions concerning this filing, please contact the undersigned.

Very truly yours,

WILKINSON, BARKER, KNAUER & QUINN

Kenneth E. Satten

By: Kenneth E. Satten

Enclosure

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

In the Matter of	)	
	)	
Advanced Television Systems and Their Impact on the Existing Television Broadcast Service	)	
	)	
Review of Technical and Operational Requirements: Part 73-E. Television Broadcast Stations	)	MM Docket No. 87-268 RM-5811
	)	
Reevaluation of the UHF Television Channel and Distance Separation Requirements of Part 73 of the Commission's Rules	)	

COMMENTS OF
BONNEVILLE INTERNATIONAL CORPORATION

Bonneville International Corporation ("BIC"), by its attorneys, hereby submits these comments in response to the Notice of Inquiry ("NOI") concerning advanced television ("ATV") issued by the Commission on August 20, 1987. BIC is the operator of KSL-TV, Salt Lake City, Utah and, through wholly-owned subsidiary KIRO, Inc., of KIRO-TV, Seattle, Washington. 1/

I. INTRODUCTION

BIC supports the comments being filed today by the Association of Maximum Service Telecasters ("MST") and the National

1/ BIC is also the operator of twelve AM and FM stations.

Association Broadcasters ("NAB"). 2/ More specifically, BIC applauds the Commission's inquiry into ATV inasmuch as it is an acknowledgement of the substantial implications of this new technology for all local broadcasters. BIC agrees with MST and the NAB, however, that it is premature to comment on the merits of various improved National Television Systems Commmittee ("NTSC") systems or other ATV systems until industry studies of these proposals, now underway, have been completed. Similarly, a judicious evaluation of spectrum allocation issues must await the outcome of these studies. Once information on the several ATV alternatives is known, the Commission should place a high priority on compatibility of the new system with NTSC receivers and the 6 MHz channelization scheme and reject any proposal to allow mutually negotiated interference.

II. THE IMPLICATIONS OF ATV FOR LOCAL BROADCASTERS

Current actors in the video marketplace include local television broadcasters, cable operators, videodisc and cassette purveyors, DBS/SMATV operators, MMDS/ITFS licensees, and distributors of programming to home satellite earth stations. None of these groups, except for local television broadcasters, must deliver their video product in a 6 MHz bandwith format. In addition, of these groups, only local television broadcasters are required by law to provide programming in response to the needs

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2/ BIC was a signatory to the Petition for Notice of Inquiry concerning ATV filed by MST, the NAB, and 56 other broadcast organizations and companies in February 1987.

and interests of their communities of license. Thus, any improvements in video technology that cannot be delivered in a 6 MHz format have potentially severe consequences for local broadcasters, not only as business people competing in the video marketplace, but as providers of community-responsive programming.

The implications of the new ATV technologies for American television are therefore profound. Technological improvements are needed and welcome but must be implemented with due regard for our unique system of local, over-the-air broadcasting. BIC encourages continued sensitivity to this critical component of the ATV inquiry.

III. IT IS PREMATURE TO COMMENT ON PARTICULAR ATV PROPOSALS OR SPECTRUM ALLOCATION ISSUES

In Section II of its NOI, the Commission seeks comment on the merits of various ATV systems, including improved NTSC systems and other enhanced TV systems. In Section III, it discusses at length a series of spectrum allocation issues, noting that "after considering the comments received in response to this inquiry, we intend to resolve the spectrum-related issues in a rule making proceeding expeditiously." 3/ More specifically, the Commission inquires into, among other things, whether additional spectrum should be allotted to ATV beyond the current 6 MHz bandwidth, and, if so, whether additional spectrum should be authorized from existing VHF and UHF television allocations, from

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3/ NOI at ¶ 41, footnote omitted.

unallocated spectrum, from reallocation of existing spectrum, or from some combination of the above. As part of these proposals, the Commission is considering modifying or eliminating various interference protection criteria.

BIC strongly believes that the evaluation of specific ATV proposals and consideration of spectrum allocation issues cannot occur until more information is known about the various ATV systems under development.

For example, it has been suggested that High Definition Television ("HDTV") can be provided within the existing 6 MHz channelization scheme. At present these compatible systems exist only as computer simulations of concepts. They have not yet been built or subjected to operational tests. These systems use bandwidth compression schemes to re-use spectrum by inverting and interleaving additional HDTV information on and between existing NTSC spectrum components. These compatible systems are ingenious and their engineers should be encouraged and commended. However, questions have been raised as to whether these systems are simply further modifications of the 48 year old NTSC system which they are meant to replace. Some query whether these systems are really Extended Definition Television Systems ("EDTV"), instead of true HDTV. A serious concern is what will happen to these more complex signals under typical multi-path conditions found in "real world" broadcasting. Will poor linearity of existing cable, MATV, and translator systems generate cross-talk artifacts between the NTSC and HDTV components? Ghost cancelling is not

specified in the simulated systems but seems necessary for all over-the-air HDTV systems.

BIC is also concerned about such issues as: the procedures by which local broadcasters will obtain additional spectrum, if needed; whether new ATV spectrum will provide effective coverage to existing coverage areas; and what the source will be for additional channels for extended coverage via TV translators. These issues cannot adequately be addressed until more information is available concerning developing ATV systems.

Industry committees have announced plans to test proposed systems during the course of the next two-to-three years. Without the results of such operational testing, feasibility analysis, and subjective assessment, the Commission lacks the data necessary for informed decisionmaking. BIC accordingly urges the Commission to defer its evaluative process until the facts are in.

IV. COMPATIBILITY WITH THE NTSC RECEIVER AND 6 MHz CHANNELIZATION SHOULD BE REQUIRED

The Commission queries in its NOI how much decisional significance it should attach to the viewability of an ATV signal on an NTSC receiver, stating that "As a presumptive matter, we attach great weight to the ability of an ATV system to be viewed on an NTSC receiver. 4/ It further inquires into the use of channelization schemes, different from the conventional 6 MHz scheme, to distribute ATV signals.

4/ NOI at ¶ 83.

BIC believes that any ATV system ultimately selected for the American video market should be compatible with the existing NTSC receiver and channelization scheme. Only in this way can the Commission ensure that improvements in video quality become available to all Americans. 5/

V. THE COMMISSION SHOULD REJECT PROPOSALS TO ALLOW INTERFERENCE TRADING

In Section V of the NOI, the Commission suggests the possibility of allowing "licensees greater discretion in determining the levels of interference they wish to tolerate." 6/

BIC generally opposes such an approach. It is concerned that negotiated acceptable levels of interference could ultimately have an adverse impact on the television band as a whole. Such negotiations subjugate the rights of the viewing public to the interests of private parties, and represent an abrogation of the Commission's statutory responsibility to ensure that all viewers receive a technically acceptable level of

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5/ In this regard, it should be noted that the transition to ATV involves high costs for studio and transmitter conversion. During the transition, possible double or higher capital and operating costs will be incurred. Accordingly, the Commission should recognize the importance of these financial considerations in approaching the issue of compatibility.

6/ NOI at ¶ 113.

television service. BIC urges the Commission to reject proposals authorizing negotiated interference. 7/

VI. CONCLUSION

For the foregoing reasons, BIC urges the Commission to defer decision on specific ATV proposals or spectrum allocation issues at this time, to insist that any finally adopted ATV system be compatible with the NTSC channelization scheme and NTSC receiver, and to reject proposals to allow negotiated levels of interference among television stations. BIC believes that the future of television broadcasting lies with the development of ATV systems. It commends the Commission for its efforts and urges the Commission to continue its work with industry in this important area.

Respectfully submitted,

BONNEVILLE INTERNATIONAL CORPORATION

By: Kenneth E. Satten

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November 18, 1987

7/ BIC expressed similar concerns in its comments filed in response to the Report on the Status of the AM Broadcast Rules, RM-5532, released April 3, 1986.