

format or display rate, conversion methods between source and display rates should be left to software producers.^{64/} As the Motion Picture Association of America aptly points out, computers could convert the 60 Hz signals into 72 Hz display rates using the same frame rate conversion techniques used to convert 50 Hz television in other countries to 60 Hz used in the United States and Japan.^{65/} Given the limits of a 6 MHz terrestrial channel, a higher transmission rate would cause either reduced spatial resolution or increased compression artifacts.^{66/} Moreover, a higher rate would increase costs to consumers.^{67/}

C. THOSE IN THE MOTION PICTURE INDUSTRY OPPOSED TO ADOPTION OF THE ATSC DTV STANDARD OFFER NO CREDIBLE SUPPORT FOR SUCH A POSITION.

The motion picture industry had ample opportunity during its involvement in the ACATS and ATSC processes to help fashion the contours of the ATSC DTV Standard.^{68/} That industry is now sharply divided as to the merits of the ATSC DTV Standard. The most broadly representative group, the Motion Picture Association of America, supports adoption of the ATSC DTV Standard, including its aspect ratio and interlaced scanning parameters.^{69/} By contrast, the narrower Coalition of Film Makers

^{64/} See id.

^{65/} See Comments of MPAA, at 7.

^{66/} See id.

^{67/} See Misener Memo, at 5.

^{68/} See Comments of EIA, at 15 ("Contrary to their claims, the concerns of the computer and movie industries were addressed during the open consultative process that led to the adoption of the ATSC DTV Standard, as is evident from the Standard's inherent flexibility.")

^{69/} See Comments of MPAA, at 2, ("MPAA supports the technical aspects of the ATSC Standard, particularly: (1) the 16:9 aspect ration and (2) interlaced and progressive scanning parameters in relation to interoperability.") See also Comments of Universal City Studios, at 2.

supports adopting a standard but does not endorse the ATSC DTV Standard because of concerns about the Standard's aspect ratio, refresh rates, and inclusion of interlaced scanning.^{70/}

The MPAA is right. As it notes, "[a]ny discussion of interoperability must begin by recognizing that the [DTV standard] represents by far the most interoperable broadcast television system ever conceived."^{71/} For example, the 16:9 aspect ratio "offers the greatest flexibility to preserve the maximum amount of original creations as they were designed and optimizes screen use over a wide range of original aspect ratios."^{72/} The 16:9 aspect ratio, which has been widely adopted by international standards bodies, was included after extensive participation by the motion picture industry.^{73/} Defection by some in the motion picture industry over these technical issues should not be permitted to delay or waylay the transition to DTV.

* * *

The country has waited long enough to upgrade its broadcast television service. Further delay, the introduction of additional uncertainty, or the abrupt embrace

^{70/} See Comments of the Coalition of Film Makers, at 5-9.

^{71/} See Comments of MPAA, at 5.

^{72/} Id., at 3.

^{73/} Id.; see also Comments of ATSC, at 26-27.

of unproven proposals from DTV bystanders would imperil the transition to DTV. The Commission should avoid this path. Instead, it should move forward on its proposal to adopt the ATSC DTV Standard in its entirety.

Respectfully submitted,

ASSOCIATION FOR MAXIMUM
SERVICE TELEVISION, INC.

A handwritten signature in cursive script that reads "Jonathan D. Blake / 1996". The signature is written in black ink and is positioned above a horizontal line.

Jonathan D. Blake
Gerald J. Waldron
Ellen P. Goodman
Thomasenia P. Duncan
Covington & Burling
1201 Pennsylvania Avenue, N.W.
Post Office Box 7566
Washington, D.C. 20044
Phone: (202) 662-6000
Fax: (202) 662-6291

Its Attorneys

August 12, 1996