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December 3, 1996

HAND DELIVERY

The Honorable Reed E. Hundt
Chairman
Federal Communications Commission
1919 M Street, N.W. - Room 8000
Washington, DC 20554

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Office of Secretary

Dear Chairman Hundt:

The events of the past two weeks recall the meeting of some of MSTV's board members with you on October 3, 1996, in which we discussed the DTV standard and DTV allotment/assignment issues. This letter reports on follow-up to our October 3 meeting and on progress -- which we believe has been quite considerable -- toward our common goal of fast, effective roll-out of DTV, consistent with the public interest. By and large, that progress has been within the channels that you and we discussed on that occasion.

Standard

The compromise reached on the standard seems to be responsive to the ideas you outlined in that meeting. You asked why the aspect ratios couldn't be omitted from the standard adopted by the Commission in order to meet some of the concerns of the Film Coalition. That is what the settlement proposes. You also appreciated the need for a government-mandated standard to protect against interference and to provide the undergirding for the DTV allotment/assignment table, but asked about not mandating the picture format layer, for example. That also, in general terms, is the course urged by the settlement. And, of course, you urged the discussions which subsequently we engaged in.

Allotments/Assignments

The Further Notice on DTV allotments/assignments described its proposed table as a draft and invited suggested

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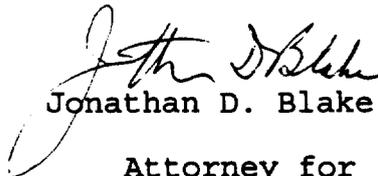
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revisions. In our meeting on October 3, you expressed appreciation for the task we were in the process of undertaking -- informing broadcasters about the intricacies of constructing any DTV table and creating a process to propose initial and ongoing revisions to the FCC's table. We have worked very hard to perform this function, using the various activities and mechanisms described in our November 22 comments. Some chafing at the inevitable consequences of trying to squeeze 1650 new DTV stations and to accommodate as many of the 8500 translators and LPTVs as possible without using a single additional megahertz will be heard from individual stations. But what is remarkable is the consensus in support of the Notice's basic allotment/assignment strategy, with the exception, principally, of the Channel 60-69 and core channel proposal.

The seemingly numerous changes proposed in our table reflect the so-called daisy chain effect and, superficially, mask the large commonality of approach between the Broadcasters' and the Notice's plans. We continue to work informally and cooperatively with the Commission's staff to get to the bottom of various discrepancies between the FCC's database and station information and on other details. As we move swiftly through the final stages of the DTV proceeding, we hope to build on the substantial areas of agreement and effectively narrow the differences between our approach and that of the Notice so that DTV can be licensed by early spring.

MSTV looks forward to continuing to work with the Commission on these issues and if we can be of assistance in providing information or otherwise, please let us know.

Respectfully submitted,



Jonathan D. Blake

Attorney for
Association for Maximum
Service Television, Inc.

cc: Commissioner James H. Quello
Commissioner Susan Ness
Commissioner Rachelle B. Chong
Docket No. 87-268