

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

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Federal Communications Commission  
Office of Secretary

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

MM Docket No. 87-268

Fifth Further Notice of )  
Proposed Rule Making )

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COMMENTS OF ZENITH ELECTRONICS CORPORATION

Zenith Electronics Corporation hereby submits the following comments on the recent agreement regarding technical standards for digital television (DTV) reached by the Broadcasters Caucus, the Consumer Electronics Manufacturers Association, and the Computer Industry Coalition on Advanced Television Service. Principally, these parties have agreed that the Commission should adopt no later than December 31, 1996, the ATSC DTV Standard, except for its specific video formats, as the transmission standard for the nation's next generation of terrestrial broadcast television.

As one of the key contributors in the decade-long process of developing world-leading digital television technology, Zenith endorses this agreement and strongly urges the Commission to adopt its provisions. By so doing, the Commission can resolve the controversy that has delayed the introduction of digital television, finally bringing consumers the quantum improvements in video and audio quality available from digital high-definition

television (HDTV), as well as a host of innovative entertainment, education and information services that can help meet pressing needs in our information-age society.

In our August 12, 1996 Reply Comments in this proceeding, we stressed the importance of the Commission adopting the ATSC DTV Standard in order to give the necessary clear direction and certainty for investors, broadcasters, manufacturers and consumers to begin the transition to digital television. Although we would prefer to see the video formats of the ATSC DTV Standard mandated by the Commission, we are pleased that this agreement paves the way for rapid Commission adoption of the core DTV technologies, including the Dolby AC-3 audio system, the MPEG-2 video compression techniques, the MPEG-2 packetized data transport structure, and the vestigial sideband (VSB) digital modulation and transmission system developed by Zenith as part of the Grand Alliance HDTV system. With these elements clearly specified and required for digital broadcasts over the transition channels to be loaned to broadcasters, and relying on voluntary industry standards such as the ATSC DTV Standard for the specific video formats to be utilized, we believe that investors, broadcasters, manufacturers and consumers will have adequate certainty to make the further investments required to bring digital television rapidly to market.

Indeed, with Commission adoption of the DTV standard by the end of this year as outlined in the agreement, Zenith will have the certainty it needs to complete its development of digital television receivers. Assuming such action by the Commission, Zenith expects to introduce HDTV receivers beginning in 1998, about the same time we expect commercial terrestrial HDTV broadcasts to begin in earnest.

Zenith applauds the efforts within the consumer electronics, broadcast, and computer industries to forge this agreement, which paves the way for final adoption of the U.S. DTV

transmission standard, representing by far the world's most flexible, computer-friendly television system. And we commend Commissioner Ness, in particular, for her leadership in bringing the opposing parties together and pushing for resolution of the issue that had been holding up adoption of the standard. Now, with no political or technical barriers to FCC action, we believe that the U.S. can quickly regain its world lead in the implementation of digital television technology.\*

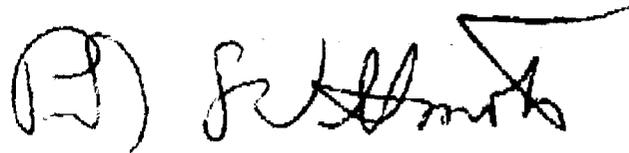
In addition to the quantum improvements in the technical quality of free over-the-air television which will allow broadcasters to compete successfully against other delivery media in the future, and the wealth of new information services that will also be enabled, rapid adoption of a broadcast DTV standard will preserve and create high-skill jobs and promote economic growth, and will enable the Commission to adopt a far more efficient utilization of television spectrum and recover large blocks of invaluable spectrum. By ending the controversy that has delayed adoption of a standard and jeopardized these benefits, the recent agreement gives the Commission the green light to adopt a DTV standard this year and bring these benefits to the American public. Furthermore, final FCC action this year will give a significant boost to ongoing industry efforts to promote use of the ATSC DTV Standard in other countries, benefiting all consumers served by the standard, as well as the American firms that have pioneered digital television technology.

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\* As discussed in detail in the December 6, 1996 Further Comments of the ATSC and the Further Comments of the Grand Alliance, removal of the video format constraints, including any specific aspect ratios, from the mandatory aspects of the standard makes it crystal clear that the desire of some members of the film industry to require that films be broadcast in their original aspect ratios has nothing to do with the standard itself. Whether or not the Commission chooses to intervene in a quarrel within the film industry, the remaining concerns of some film makers offer no valid reason for any further delay in setting a digital broadcast transmission standard.

Accordingly, before the end of this year the Commission should adopt the ATSC DTV Standard, except for its specific video format constraints, as the standard for digital terrestrial television broadcasts. In addition, the Commission should act early next year to finalize channel assignments and issue service rules so that the implementation of digital terrestrial television can shift into high gear. By acting now, the Commission will unleash the substantial final investments required to bring the many benefits of this fruitful technology to the American public.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "P. Willmott", with a large, stylized flourish extending from the end of the signature.

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