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January 7, 1998

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: ***Ex Parte Notice***
In the Matter of Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service
MM Docket No. 87-268

Dear Ms. Salas:

The Association for Maximum Service Television ("MSTV") hereby notifies the Commission that MSTV representatives (Victor Tawil, Jonathan Blake and Ellen Goodman) met with David Siddall and Anita Wallgren, legal advisors to Commissioner Ness; Jane Mago and Paul Jackson, legal advisors to Commissioner Powell; Paul Misener and Commissioner Furchtgott-Roth; and Rick Chessen, legal advisor to Commissioner Tristani on January 6, 1998. The conversations covered: (1) MSTV's de minimis interference proposal to relax the Commission's "no new interference" standard so as to permit minor facility changes and power increases that cause minimal interference; (2) MSTV's November 20 proposal to improve the DTV Table; (3) MSTV's proposal, set forth in its petition for reconsideration and other filings in this docket, that the Commission establish DTV coordinating committees to provide technical support, using the FCC's methodology, in the DTV application process; and (4) MSTV's and other broadcasters' proposal, set forth in MSTV's petition for reconsideration and other filings in this docket, that the FCC follow past practice by requiring auction winners that displace out-of-core DTV licensees after the transition to compensate those licensees for their moves to in-core channels.

With respect to point (4) above, a question arose as to how much it might cost a licensee to relocate its DTV facilities from one channel to another after the transition. The attached estimate was submitted as an ex parte filing last year. Under the DTV Table that was adopted in April, there are 346 licensees that will have to move to an in-core DTV channel if the core is defined as channels 2-46 and 230 licensees that will have to move to an in-core DTV channel if the core is defined as channels 7-51.

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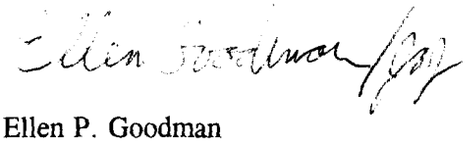
Any questions with respect to this matter should be directed to the undersigned.

Respectfully submitted,



Ellen P. Goodman
Attorney for the
Association for Maximum Service
Television, Inc.

Attachment

cc: Commissioner Furchtgott-Roth
Mr. Chessen
Ms. Mago
Mr. Misener
Mr. Jackson
Mr. Siddall
Ms. Wallgren

MEMORANDUM March 6, 1997

For : Lynn Claudy
From : Art Allison
Subj. : Average costs to move a DTV channel when repacking occurs

This analysis focuses primarily on those stations which have been assigned UHF channels for both DTV and NTSC which are above the repacking cutoff frequency. The average cost to move such a DTV station to below the repacking cutoff frequency is estimated to be between $400,000 and $600,000. The average cost for stations which can relocate their DTV channel to their NTSC channel is estimated to be between $10,000 and $100,000.

The primary variables that affect this cost are the power of the DTV station and how far in operating frequency it must shift. If the new channel is close in operating frequency to the old channel it will be less expensive than if the new channel of operation is far away from the old channel in frequency. If the power is high it will cost more than if the transmitter power is low.

Cost estimates were made for a number of cases. All of the cases used a combination of one of three DTV effective radiated powers (500 kW, 320 kW and 50 kW) and one of three ratios of new versus old frequency of operation. The cost for each of these cases was estimated with varying assumptions about the amount and kind of work needed. These individual estimates were then combined using various assumptions about the share of each of these cases in the country to see the effect on the average for the industry. No adjustments were attempted to address inflation or changes in equipment costs over the interim period before this repacking of channels and all costs are in 1997 dollars. The estimated costs for the individual cases range from $10,000 to $1,010,000. The industry-wide per-station average cost changes with different assumptions, but remains in the range from $400,000 to $600,000 for reasonable assumptions. Some examples of individual cases that were analyzed follow.

- From Channel 65 to Channel 16; 500 kW: Estimated cost = $725,000
- From Channel 58 to Channel 30; 50 kW: Estimated cost = $261,000
- From Channel 47 to Channel 44; 320 kW: Estimated cost = $66,000

Stations which move from their transitional DTV channel to their NTSC channel were assumed to be able to use most of their NTSC transmission facilities by making relevant modifications and reconnection of the DTV equipment to the NTSC transmission facility. The cost range for this situation is estimated to typically be in the range from $10,000 to $100,000.

Detailed Assumptions for example cases in March 7, 1997 memo.

- From Channel 65 to Channel 16; 500 kW: Estimated cost = $725,000

The new cost to build the transmit frequency related portion of a 500 kW ERP station on Channel 16 was estimated to be $1,246,000. The feed line could be reused. A new main and backup antenna (G=30) would be purchased and installed. The tube type transmitter (from Ch 65) could be reworked for 25% of the full purchase price. The installation and ground RF interconnect aspects of the job would cost 85% of the original purchase cost.

- From Channel 58 to Channel 30; 50 kW: Estimated cost = $261,000

The new cost to build the transmit frequency related portion of a 50 kW ERP station on Channel 30 was estimated to be $332,000. The feed line could be reused. A new main and backup antenna (G=15) would be purchased and installed. The solid state transmitter (from Ch 58) would have modules replaced for 55% of the full purchase price. The installation and ground RF interconnect aspects of the job would cost 65% of the original purchase cost.

- From Channel 47 to Channel 44; 320 kW: Estimated cost = $66,000

The new cost to build the transmit frequency related portion of a 320 kW ERP station on Channel 47 was estimated to be $920,000. The feed line, the existing main antenna and the backup antenna would be reused with no changes. The transmitter (from Ch 47) could be realigned for 5% of the full purchase price. The installation and ground RF interconnect aspects of the job would cost 5% of the original purchase cost.