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

In the Matter of

Authorization of Next Generation TV for  
Permissive Use as a Television Standard

Docket: GN 16-142

**Via the ECFS**

**COMMENTS OF JOHN NOTOR**

I am the President/Chief Technologist of a small wireless consultancy, Notor Research, (web: <http://www.notor.com/>) whose focus is wireless technology including wireless standards, wireless system engineering, radio regulatory advocacy and related matters. In the interests of full disclosure, I participate in IEEE 802 wireless standards development as a voter in IEEE 802.11 and IEEE 802.15, and I participate in the IEEE 802 radio regulatory advocacy activities as a voting member of the IEEE 802.18 Radio Regulatory Technical Advisory Group.

My company is a member of the Telecommunications Industry Association (“TIA”) and I participate in the TIA TR-51 Smart Utility Networks Engineering Committee focused on developing standards for utility metering.

My comments to this proceeding are my own, and do not reflect the views of IEEE 802, TIA, or any subgroups of those organizations, nor do they reflect the views of any clients of Notor Research.

**INTRODUCTION**

1. On April 26, 2016, the FCC released a public notice seeking comment on a joint Petition for Rulemaking (“Petition”), submitted by America’s Public Television Stations (APTS), The AWARN Alliance, The Consumer Technology Association (CTA), and The National Association of Broadcasters (NAB), asking the Commission to “amend its rules to allow broadcasters to use the signaling portion of the physical layer of the new ATSC 3.0 (“Next Generation TV”) broadcast standard”.

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2. I want to thank the Commission for providing this opportunity to respond to this Petition. It is my intention to speak to the public policy aspects of this petition to allow ATSC 3.0 over the air television (“OTA TV”) broadcasts, not to the technical merits of the technology.

### **OTA TV BROADCAST IS OBSOLETE**

3. Many sources have estimated, and my own informal research has concurred with the position that most US homes do not watch OTA TV using a traditional antenna system connected to their home television receiver. The estimates I have seen are on the order of 10% or less of households that watch OTA TV as their primary source of TV viewing. In my own case, I continue to watch OTA TV for major network shows, news, and sports, but find myself increasing using streaming services like Netflix for what was traditionally TV content.
4. Most of the folks I talk to have subscriptions to cable TV services or satellite TV services for entertainment, news and sports, and do not view OTA TV at all.
5. From my perspective, this makes the current OTA HDTV broadcasts obsolete, not because the technology is obsolete, but because nobody is watching these broadcasts.
6. In this context, the introduction of a new OTA broadcast technology seems unnecessarily disruptive and without any socially redeeming qualities, especially given the need to purchase new televisions in order to receive ATSC 3.0 transmissions. Nobody is watching OTA HDTV now, who’s going to watch ATSC 3.0 TV when you have to purchase a new television to see the programming?

### **THE UPCOMING REVERSE AUCTION WILL FURTHER REDUCE OTA TV UTILITY**

7. While the exact impact on OTA TV broadcasting through the Incentive Auction process currently underway is open to debate, clearly, the auction process will reduce the number of OTA TV broadcasts available in any geographic area, especially in major metropolitan areas where the 600 MHz band spectrum is likely of most value to mobile service providers.
8. The reduction, or possibly elimination, of OTA broadcasting in major metropolitan areas adds another impediment to OTA TV viewership even with the current HDTV technology. Fewer likely viewers mean less interest in watching the post Incentive Auction residue of TV broadcasts even with no new TV technology.
9. The need to purchase new television receivers to receive ATSC 3.0 transmissions creates an additional disincentive to viewers, which, in turn, will result in less interest by television manufacturers to offer products compatible with the ATSC 3.0 broadcasts, resulting in a situation where a small or non-existent market will likely doom the commercial prospects of the new technology. So, ATSC 3.0 will be obsolete before it is even widely deployed in broadcasting because

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there will likely be few, or no, manufacturers providing a range of ATSC 3.0 compatible TV receivers for the consumer market.

**CONCLUSION**

10. My view is that OTA television broadcasting is already, for all practical purposes, obsolete due to declining numbers of viewers. Introducing a new transmission technology, ATSC 3.0, does not make it less obsolete.
11. In the current market, television receivers are already readily available to receive HTDV OTA broadcasts at a price point favorable to viewers who may wish to continue watching OTA TV in a restructured, post Incentive Auction, environment.
12. The likelihood that television manufacturers are going to offer competitively priced products that receive ATSC 3.0 in a market with fewer and fewer OTA TV viewers due to the reduction in available OTA channels is, in my view, small to the point of non-existence.
13. I recommend that the Commission reject the subject Petition for Rulemaking.

Respectfully submitted,

John Notor

/s/

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