

Cohen, Dippell and Everist, P.C.

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

In the Matter of)
)
Media Bureau Seeks Comment on Joint) GN Docket No. 16-142
Petition for Rulemaking of America’s)
Public Television Stations, The AWARD)
Alliance, The Consumer Technology)
Association, and The National Association)
of Broadcasters Seeking To Authorize)
Permissive Use of The “Next Generation)
TV” Broadcast Television Standard)

Comments
on Behalf of
COHEN, DIPPELL AND EVERIST, P.C.

The following comments are submitted on behalf of Cohen, Dippell and Everist, P.C. (“CDE”) and is in response to the Public Notice released April 26, 2016. CDE and its predecessors have practiced before the Federal Communications Commission (“FCC”) for over 75 years in broadcast and telecommunications matters. The firm or its predecessors have been located in Washington, DC since 1937 and performed professional consulting engineering services to the communication industry.

The undersigned is licensed as a Professional Engineer in the District of Columbia and has been in continuous employment with this firm or its predecessors for over fifty (50) years.

The undersigned in the brief time allotted commends the filing including the Attachment B¹ which provided the initial system documentation performed by Meintel, Sgrignoli and Wallace, LLC. Pearl Mobile DTV, LLC retained Meintel, Sgrignoli to perform a comparison of ATSC 3.0 with the current ATSC standard 1.0. This is very important comparison and support is given to its technical importance as it provides a foundation that ATSC 3.0 can operate within the existing 6 MHz television channel.

This firm looks forward to the other aspects such as off-the-air reception and ATSC 3.0's ability to provide superior service in varying environments. Other aspects of signal delivery will need to be subject to scrutiny.

The promise alleged with the adoption ATSC 1.0 that it would have graceful degradation never materialized. In fact, in a varying and rapid signal environment with multiple reflections, the ATSC standard 1.0 suffers reception's impairments. This firm looks forward to a standard that achieves the goal of reliable off-the-air reception in difficult environmental conditions.

This firm filed in MM Docket No. 87-268² the following observations. They are abstracted as follows:

“CDE continues to believe that terrestrial off-the-air broadcasting performs and will continue to perform a necessary role in informing the general public whether it be the underprivileged or the general public. Broadcasting is the only medium that provides information at virtually no cost to the consumer, provides a wide

¹Appendix A provided the important work performed by the ATSC 3.0 Committee

²November 15, 1995

variety of programming and is directly responsive to these viewers each rating period. It provides local information such as news, weather and sports.”

“We note that television service from the inception was allowed to bring a multitude of services to the general public and develop those services without any direct governmental interference. Fundamentally, television and other broadcasting mediums have served to be the vehicle from which the information revolution has been launched. Therefore, if the Commission desires this medium to continue to be in the forefront of the introduction of information to the general public, then the broadcast industry should be permitted to use the available technical tools³ without impediment. Terrestrial broadcasting must be able, not only to improve its product but must have the unrestrained ability to use additional technical tools to serve the public with new and innovative services provided that it:

- (1) creates no objectionable interference to existing users and
- (2) its primary use is broadcasting to the general public.

The ability to provide these alternatives to the public is indeed remarkable, since less than ten years ago the technical opportunity for this discussion could not be made or imagined.”

The above was filed in 1995 in MM Docket 87-268 and was true then and now.

This firm believes that DTV service will be advanced through the investigation and adoption of a complete standard. The implementation of a new standard throughout the United States and adjoining administrations is yet to be determined.

³For example, AM stereo broadcasting was available in the 1960's; however, the Commission and other interests chose to refrain from this technological possibility in order to foster FM development. The Commission later elected to revisit this question, but the outcome was not timely nor decisive enough to enable AM broadcasting to compete.

Respectfully Submitted,

COHEN, DIPPELL AND EVERIST, P.C.

A handwritten signature in black ink, appearing to read "Donald G. Everist", written in a cursive style.

Donald G. Everist
President

DATE: May 26, 2016