

I am unable to receive clear terrestrial signals in an urban setting due to hills. Two local broadcasters (KCPQ-Fox) and (KIRO-CBS) have petitioned to have my PrimeTime24 network service stopped. While the former has granted me a waiver, the latter has not responded to repeated phone calls and correspondence.

The criterion of a Grade-B contour is poorly defined and can't account for the signal anomalies present in urban multipath distortion. This bodes poorly for the future of finicky digital signals being even more erratic in these circumstances. I am left with no clear standard to fight the SHVA embargo.

The Commission needs to do more to shift the burdon of proof for poor/non-reception in favor of the consumer. We lack the technical equipment, stable standards (and income) for field measurements now necessary to fight SHVA embargoes. Suggestions:

1. The SHVA embargo should hold only for those able to receive high quality, undistorted A-grade signals.
2. The burdon of proof for signal quality should be more balanced in favor of the consumer, obliging the local broadcaster to show high quality reception possible before SHVA embargoes are upheld.
3. The preservation of local signals under SHVA should include a local public service test of the broadcaster so protected