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Before the Federal Communications Commission  
Washington, DC 20554

In the Matter of ) CS Docket No. 98-201  
) RM No. 9335  
) RM No. 9345

Reply comments of  
Electronics Technicians Association,  
International, Inc.  
Richard L Glass, CETsr  
President  
602 N. Jackson  
Greencastle, In 46135

Dec. 16, 1998

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Introduction:

The Electronics Technicians Association, International has made extensive comments to CS Docket 98-201 during the comment period. In those comments, our suggestion for physical signal level measurements suggested the field antenna technician and the SHVA would be best served if the height of the test antenna was such that the antenna, mast, and cable could reasonably be managed by one person. Our suggestion included using:

1. A small dimension UHF/VHF all band antenna with specified gain characteristics for each channel to be measured.
2. Balun transformer -300 ohms to 75 ohms to connect a 50 foot length of RG-6 coaxial cable from the antenna to the test signal level meter.
3. Signal level meter which displays analog or digital RMS microvolt readings.
4. Antenna height to be set 20 to 30 feet above ground level.

Prior to presenting our comments, we had noticed another interested party, a major company in the satellite industry, suggested that the resultant antenna signal level readings should be adjusted to reflect the number of splitters in a household. Because this same splitter comment has been made again in these docket comments, we are compelled to respond.

Argument:

There is no value whatsoever in bringing signal splitters into the comment discussion. Spend two minutes considering the subject, and you will see the splitter item has to be expunged to get down to the real business this docket addresses.

After the signal has been brought into the home, the homeowner can split the television signal as many times as he wishes. It is not uncommon to wire homes today for ten or more convenient television outlet jacks. The number of splits should have no bearing on whether the signal derived from an outside rooftop antenna is delivering more, or less signal than the SHVA mandates.

Were the number of splitters a determining factor, Let me install a couple of 16-way splitters in my A Contour location and then demand access to network TV signals via satellite! Never mind that I may not be using but one of the 32 outlets, or that they may be downstream from a high level antenna output split near the signal origination point where perfect signal levels are present.

It is absurd to suggest splitters be a factor in the measurement process. If the homeowner has signal levels above the class B minimum, then he can simply boost that signal with a common booster amplifier. These have been made and used for decades. Small 6 to 12 dB signal amps are commonly used to overcome the losses in using three to ten outlets from a signal source. If more outlets are needed, additional downstream line amplifiers are commonly used.

Antennas, rotors, pre-amplifiers, line amplifiers, splitters, and (where needed) attenuators are all part of proper television antenna receiving systems. Amplifiers and splitters are installed where needed to allow the specified level of television signal at the terminals of a television set. The television set is specified for 1000 microvolts of signal. If the antenna system is supplying less than 1000 microvolts, you boost it with a line amp. If it has considerably more than 1000 microvolts, you insert an attenuator in

series to optimize the signal level to match the television specifications. While today's modern television sets can compensate for considerably higher levels of signal, and television tuners are less noisy than in the early days of television (thus the TV displays a better picture with lower than specified signal levels), the 1000 microvolt standard input still remains the proper level to be delivered from an antenna system.

Conclusion: What the homeowner does with the signal after the SHVA available signal test has ascertained the home is or is not eligible for networks via satellite, should not be a factor in setting the signal levels for SHVA

Respectfully submitted,

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