

Cohen, Dippell and Everist, P.C.

Before The  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matter of )

Amendment of Parts 73 and 74 of )  
the Commission's Rules to Establish )  
Rules for Digital Low Power )  
Television, Television Translator )  
and Television Booster Station and )  
to Amend Rules for Digital Class A )  
Television Stations )

MM Docket No. 03-198

Comments on  
Notice of Proposed Rule Making

The firm of Cohen, Dippell and Everist, P.C. or its predecessors has practiced in the broadcast consulting engineering field for over 65 years. These comments are in response to the Notice of Proposed Rule Making ("NPRM") which proposes amendment of Parts 73 and 74 of the Federal Communications Commission's ("Commission") Rules with reference to digital low power television, television translator, television booster stations and digital Class A television stations.

The Commission is to be commended for advancing a very comprehensive NPRM to provide valuable guidance to foster development to implement digital transmission for translator, low power television, booster and Class A stations. The following is respectfully offered.

**Coordination–International Borders**

The Commission is urged to develop an effective coordination process with neighboring administrations. It is recognized that power levels from the stations under consideration are lower than for typical full service stations. However, based on current DTV coordination experience, this has been a time-consuming and uncertain process. Therefore, notwithstanding the ultimate rules adopted, the Commission needs to undertake measures that will allow effective coordination for applications whereby adjoining administrations need to be considered. This is necessary as these translators, low power television, boosters and Class A stations can ill afford lengthy, complex and time-consuming issues to be an impediment to digital conversion.

**Longley-Rice Propagation Model**

It is recommended that the Commission, for the purpose of a minor change, continue the use of the bounded contour when determining whether or not the proposed operation covers all or part of a licensed area. This approach is urged so that during the conversion process, NTSC translators, low power television, booster and Class A stations may make applications to specify digital operation.

**Conversion of Full Service to Digital**

The Commission is urged to consider any impact that may result from the election process in the final conversion of full service stations to digital. This issue of the process by which full service stations will begin the selection of the final digital channel is under consideration by the

Commission in the Second Periodic Review.<sup>1</sup> The process by which full service stations will undertake selection of the final digital channel will depend upon many factors. Foremost of those considerations is the allocations picture if full service stations elect to convert their NTSC channel operation to digital. Unfortunately, this requires that all translator, low power, booster and digital Class A stations remain as secondary stations during the transition.

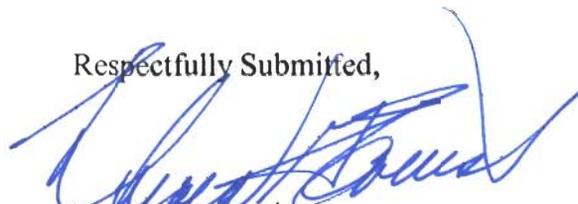
**Selective Use of Vertical Polarization**

The Commission may wish to consider where appropriate during the transition, permitting the existing translator operations whether licensed or on a special temporary authority (“STA”) faced with termination due to implementation of digital television to operate with vertical polarization. This would permit continuity of service. Most service areas established by translators, low-power television, boosters and Class A stations have a small footprint. Therefore, special temporary operation using vertical polarization would provide continuity of service to rabbit-ears type receiver antennas while allowing an established station to potentially minimize cost. Further, continued operation under STA would ensure that if the Commission determines unacceptable interference still results, the STA can be rescinded. The operation under STA would not be permitted to exceed previously authorized parameters. An additional protection ratio using a 10 dB factor could be considered.

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<sup>1</sup>*In the Matter of the Second Periodic Review of the Commission’s Rules and Policies Affecting the Conversion to Digital Television” MB Docket No. 03-15*

Respectfully Submitted,



Donald G. Everist  
President

Date: November 25, 2003