

TABLE OF CONTENTS

Executive Summary	i
I. The Enormity Of The OTA Analog Audience	3
II. The Thrust Of The <i>Notice</i> Dangerously Underestimates The Public’s Stake In Over-The-Air Television	6
A. Important Public Policy Objectives Are At Stake With The 18.9 % Of American Homes Served Only By Over-The-Air Television	7
B. The Commission Must Also Take Into Account The Enormous Number Of Analog Sets That Are Not Hooked Up To Cable Or Satellite Service.	9
C. Preserving Over-The-Air Television Serves The Interests Of 100% Of The American Public	9
III. The Importance Of OTA Service For News, Information And Emergency Alerts.	11
IV. The Digital Transition For OTA Viewers.	14

Executive Summary

NAB and MSTV hereby file reply comments in this proceeding which seek options for minimizing the disruption to consumers when the switch-over to digital broadcasting occurs. We point out in particular the enormity of the potential disruption to OTA-only households and for MVPD subscribers with OTA-only analog sets when analog broadcasting is turned off. While we recognize the important competing demands for the broadcast spectrum to be reclaimed after the transition, we emphasize here the caution that the Commission must employ in advancing the conversion to digital and ceasing analog broadcasting. Without the widespread availability of low cost digital-to-analog downconverters, the FCC risks disenfranchising millions of viewers and rendering useless the analog sets they rely on. Not only is the OTA analog set population enormous (73 million) and the number of OTA-only homes huge (20.3 million), the importance of OTA service cannot be overstated in terms of the OTA viewing public's reliance on the free, over-the-air service for news and information and emergency alerts.

Over-the-air broadcast service is in fact essential to public safety. As Homeland Security Secretary Tom Ridge emphasized, "obviously television and radio" are "the first choice" for providing information to the public during a terrorist attack. A vibrant over-the-air network is also essential during weather-related or other emergencies when cable or DBS service may be lost. The fact is television coverage of Hurricane Charley saved lives. Over-the-air television remains the single most important information safety net for all Americans in times of crisis, local or national. Other commenters emphasize this.

Many commenters have provided the Bureau with substantial data on OTA viewers and particularly for those in the OTA-only analog homes who would lose all

television service absent sufficient planning and adequate solutions in place well in advance. These data only underscore the delicacy, enormity and critical nature of altering the marketplace “test” for marking the end of the digital transition. While some of the disruptive effects of ending analog service would have been reduced under the market-driven transition established by Congress, proposals to complete the transition without regard to consumer DTV acceptance would impact much larger numbers of consumers. Several commenters explain how the *digital* transition is not aided by current proposals to consider cable subscribers with downconverted digital broadcast signals and analog sets as “digital” households and how doing so retards the true digital transition and disserves the public.

The original and still primary objective of the digital transition is to bring the promise of this technology to free, universal and local television broadcasting service. If mishandled, the transition can weaken over-the-air television, driving reluctant viewers to pay services, which are often not available in an emergency. This would cause further injury to the entire public. As other commenters also urge, the Commission and the Congress should continue to pursue a true digital transition and adopt policies that will foster that true digital transition, particularly cable carriage of digital broadcast signals, as well as eventual satellite carriage of digital broadcast signals.

We recognize there is a need to mitigate disruption of television viewing on analog sets. Other broadcasters concur, and support a government subsidy of converters for OTA-only households or OTA sets. Many commenters also support a subsidy for converters from revenues from future spectrum auctions. Inexpensive converters, noted by several commenters as expected in a few years, seem to be the key to accommodate those who cannot afford a true digital television when analog broadcasting is ended.

the widespread availability of low cost digital-to-analog downconverters, the FCC risks disenfranchising millions of viewers and rendering useless the analog sets they rely on. Not only is the OTA analog set population enormous and the OTA-only audience huge in numbers, the importance of OTA service cannot be overstated in terms of the OTA viewing public's reliance on the free, over-the-air service for news and information and emergency alerts.

In response to the Bureau's request, many commenters have provided the Bureau with substantial data on OTA viewers for use in its efforts to plan to mitigate disruption when analog broadcasting ceases, particularly for those in the OTA-only analog homes who would lose all television service absent sufficient planning and adequate solutions in place well in advance. These data only underscore the delicacy, enormity and critical nature of altering the marketplace "test" for marking the end of the digital transition and the beginning of digital-only broadcasting. As NAB and MSTV discussed in their initial comments,⁴ while some of the disruptive effects of ending analog service would have been reduced under the market-driven transition established by Congress, proposals to complete the transition without regard to consumer DTV acceptance would impact much larger numbers of consumers.⁵ Several commenters explain how the *digital* transition is not aided by current proposals to consider cable subscribers with downconverted digital

⁴ Comments of the National Association of Broadcasters and the Association of Maximum Service Television, Inc., MB Docket No. 04-210, August 11, 2004 ("NAB/MSTV") at 3-4.

⁵ For these reasons, and because of the greater reliance of the Hispanic audience on over-the-air service, Univision in its comments warns that termination of analog broadcasting in the near future would be extremely harmful to the public, and particularly to Hispanic viewers. Comments of Univision Communications Inc., MB Docket No. 04-210, August 11, 2004 ("Univision") at 1-3, 15-17.

broadcast signals and analog sets as “digital” households and how doing so retards the true digital transition and disserves the public.⁶

The original and still primary objective of the digital transition is to bring the promise of this technology -- to which all other media are converting without the regulatory handicaps that confront broadcasters -- to free, universal and local television broadcasting service, which benefits the entire public. That is the upside. On the downside, if mishandled, the transition can weaken over-the-air television, driving reluctant viewers to pay services, which are often unavailable during life-threatening emergencies. This would cause further injury to the entire public.

I. The Enormity Of The OTA Analog Audience

The supplied statistics themselves show the enormity of the eventual problem of the remaining OTA-only analog households, as well as that for MVPD consumers with OTA analog sets, were analog broadcasting terminated in the near future. NAB and MSTV data show 20.3 million analog OTA-only households, or 18.9% of U.S. TV households,⁷ and the statistics presented by others echo these tremendous numbers. NAB and MSTV’s data also showed 73 million unwired analog-only televisions in OTA and MVPD households with at least one OTA analog-only set. *Id.* So, too, do other commenters show the breadth and depth of the overall problem of the obsolescence of analog sets once analog broadcasting ceases.⁸

⁶ *Id.* at 2-3; Comments of Paxson Communications Corporation, MB Docket No. 04-210, August 11, 2004 (“Paxson”) at 4; Comments of Sinclair Broadcast Group, Inc., MB Docket No. 04-210, August 11, 2004 (“Sinclair”) at 1, 7-8.

⁷ NAB/ MSTV at 5.

⁸ *See* Comments of the Envisioneering Group, MB Docket No. 04-210, August 11, 2004 (“Envisioneering”) at 3, 6 and Attachment.

The Association of Public Television Stations calculates those with exclusive over-the-air reliance as approaching 22% of all TV households,⁹ and cites research commissioned by the Corporation for Public Broadcasting that found that about 20% U.S. households were “broadcast-only.”¹⁰ And, as APTS points out, this statistic is an average, with OTA reliance in fact ranging from a “startling” 40 percent in one DMA to 5.8 percent in another. *Id.* APTS notes that, even among the largest DMAs over-the-air reception approaches 30 percent in three large DMAs, over 25 percent in two others and 20 percent in Los Angeles. *Id.*

The Walt Disney Company attached to its comments the results of surveys of viewers in New York and Los Angeles, which show that in Los Angeles 15.3 percent of respondents rely entirely on over-the-air television, and that in New York 9.1 percent rely only on OTA service.¹¹ Moreover, Disney/ABC reports that, in New York, 29.1 percent of the viewers surveyed rely in whole or in part on over-the air service, while in Los Angeles, 37.7% rely in whole or in part on OTA service.¹²

Sinclair Broadcast Group also conducted a survey in 37 of its 39 markets, and found that 13 percent of respondents did not subscribe to an MVPD.¹³ It further found that approximately 33 percent of respondents live in households with at least one television that is used exclusively for free, OTA analog reception. *Id.* It also found that approximately 20 percent of all televisions are used exclusively for free, OTA reception,

⁹ Comments of the Association of Public Television Stations, MB Docket No. 04-210, August 11, 2004 (“APTS”) at 6-8. (NAB/MSTV noted in initial comments, at fn. 14, that there are currently approximately 177,000 OTA-only digital sets.)

¹⁰ *Id.* at 8.

¹¹ Comments of the Walt Disney Company, MB Docket No. 04-210, August 11, 2004, (“Disney/ABC”) at 2 and Attachment.

¹² *Id.* at 1 and Attachment.

¹³ Sinclair at 4.

which would extrapolate out to more than 65 million televisions nationwide which are used exclusively for free, OTA analog reception. *Id.*

The enormity of these numbers is seen, on a smaller scale, in the statistics presented by Capitol Broadcasting for its markets of Raleigh-Durham and Charlotte, North Carolina, with 17 percent of households in Charlotte and 13-17 percent in Raleigh-Durham relying solely on OTA service.¹⁴

Significantly, Univision and Entravision demonstrate in their comments that the Hispanic community relies extensively on exclusive over-the-air reception.¹⁵ Univision recites that the number of Hispanics relying solely on OTA reception actually has increased significantly and shows that, nationwide, over twelve million Hispanic viewers rely exclusively on OTA analog broadcasts.¹⁶ It goes on to show how the problem of cutting off analog service would be exacerbated in certain markets where the percentage of Hispanic OTA viewing is particularly high, *e.g.*, in Los Angeles, Houston, Dallas-Fort Worth, Phoenix and Fresno. And both Univision and Entravision state that the problem of analog sets is compounded by border viewing of Mexican analog stations.¹⁷

Further, APTS, Disney/ABC, Sinclair and Capitol show that significant percentages of the OTA-only households have lower incomes.¹⁸ As many of the commenters supported subsidies for digital-to-analog converters for lower-income

¹⁴ Comments of Capitol Broadcasting Company, Inc., MB Docket No. 04-210, August 11, 2004, (“Capitol” or “Capitol Broadcasting”) at 4.

¹⁵ Comments of Univision Communications Inc., MB Docket No. 04-210, August 11, 2004, (“Univision”) at 9-11; Comments of Entravision Holdings, LLC, MB Docket No. 04-210, July 12, 2004, (“Entravision”) at 1-3.

¹⁶ Univision at 9.

¹⁷ *Id.* at 10-11; Entravision at 2-3.

¹⁸ APTS at 9; Disney/ABC at 2 and Attachment; Sinclair at 4-7; Capitol at 4-5.

households, this greater proportion of lower-income households' relying on OTA service becomes important.

II. The Thrust Of The *Notice* Dangerously Underestimates The Public's Stake In Over-The-Air Television

The comments in this proceeding, particularly those from individual consumers, both cable subscribers and over-the-air viewers, speak volumes. For example:

- One commenter, a self-described “electronics enthusiast in [his] early forties,” chooses to be an over-the-air viewer because “[i]n a free society, it is absolutely essential to provide a mechanism of mass communication that does not limit public access by charging a monthly subscription fee,” and he is “fairly certain that this point of view is shared by many other individuals in [his] demographic group.”¹⁹
- A disgruntled rural viewer lamented that he is forced to subscribe to a pay television service because he lives in a rural area. He also points out that the *Notice* failed to request information about “MVPD subscribers who would prefer not to be. . . . [and] [t]he cost and ongoing increases for MVPD services.”²⁰

To evaluate the stake the public has in this transition (and to assess the damage that various proposals affecting the digital transition may inflict on the public), the Commission must take into account three components of the public interest served by over-the-air television: The first component is the 18.9 percent of viewers that rely solely on over-the-air service, whether because they cannot afford to subscribe to cable or DBS, because cable or DBS service is not available to them or does not provide local broadcast signals, or because they believe in the universal availability of free, over-the-air broadcast service. The second component is the owners of the millions of television sets in MVPD

¹⁹ Comments of Steven R. Bartholomew in MB Docket No. 04-210, at 1-2 (July 12, 2004).

²⁰ Comments of Thomas J. Karnauskas in MB Docket No. 04-210 (June 16, 2004) (“Requiring all consumers to relay [*sic*] on MVPD is not an option. Why even worry about broadcast signals when no one will utilize over-the-air signals? How will the cost of service be regulated to avoid uncontrolled fees increases?”).

homes that are OTA-only analog sets. The third component consists of all viewers, because all viewers rely on over-the-air service in times of weather, terrorist or other emergencies when cable or satellite service may not be available and because broadcast television service provides an effective competitive check on cable and DBS services in terms of price, service, and diversity.

A. Important Public Policy Objectives Are At Stake With The 18.9% Of American Homes Served Only By Over-The-Air Television

Many of the 18.9 percent of U.S. households that receive television service solely over the air do so by choice, not because economics dictates it. For example, almost half of respondents in a survey conducted by Sinclair Broadcast Group indicated that they did not subscribe to cable or satellite for reasons other than cost.²¹ And a survey conducted by the Consumer Electronics Association found that “[l]ess than 30 percent [of households that have chosen not to subscribe to cable or DBS] indicate that insufficient funds play a role in their decision not to subscribe.”²² Many Spanish-speaking viewers choose not to subscribe to cable or DBS because these services offer primarily English-language programming.²³ This issue is compounded in communities that receive over-the-air broadcast signals from Mexican television stations. Because Mexico lags far behind the United States in transitioning to digital and because Spanish-speaking viewers in border states are able view over-the-air signals from Mexico in addition to domestic signals, these viewers will not view pay services as a viable alternative, but will continue

²¹ Sinclair at 6-7.

²² Comments of the Consumer Electronics Association, MB Docket No. 04-210, August 11, 2004 (“CEA”) at 4.

²³ Entravision at 2.

to rely on over-the-air Mexican signals even if cut off from U.S. stations as a result of the digital transition – an outcome not consistent with our democratic goals.²⁴

But there are also a large number of viewers who cannot afford pay television. Twelve percent of American households fall below the poverty line.²⁵ They should not be forced by government policy into paying subscriber fees that only escalate over time and that they can't afford. They deserve as an option -- the preferred and responsible option -- a vibrant, over-the-air service that provides the benefits of new digital technologies.

Over-the-air viewers have important, well thought out and legitimate reasons for relying on over-the-air reception, e.g., they believe in the value of free, over-the-air television; they do not want to be locked into the ever-increasing costs of pay television service; they view primarily alternative-language programming; they have additional sets that are not hooked up to cable or satellite, among others. They feel well-served by the locally-oriented and public interest programming they receive over the air and do not see the need nor do they want to be pushed to ever more expensive pay television services. At a time when the Commission is investigating ways to assure localism on broadcast stations, the Commission should heed their concerns and take steps to keep them from being shut out or marginalized as the transition progresses. Because broadcast television is universally available and is the only service used by millions of Americans, the Commission should ensure that viewers continue to have the option to rely on over-the-air reception and still receive meaningful local broadcast service.

²⁴ Entravision 3; Univision at 10-11.

²⁵ *See Census Bureau says 1.3 million more slipped into poverty last year; health care coverage also drops*, CNN Money (Aug. 26, 2004), available at http://money.cnn.com/2004/08/26/news/economy/poverty_survey.

B. The Commission Must Also Take Into Account The Enormous Number Of Analog Sets That Are Not Hooked Up To Cable Or Satellite Service

An enormous number of consumers' current sets – over 28 million -- are analog sets in MVPD homes not hooked up to cable or satellite that consumers are undoubtedly counting on to provide service for years to come.²⁶ With the Commission continuing to permit the sale of analog sets, although on a staged-down basis over the next several years, it cannot responsibly cut these consumers off at the knees.

In addition, as the Envisioneering Group explained, the Commission also must “accommodate the tens of millions of portable TVs, and the tens of millions of existing (analog) TVs operating daily in public places, which are viewed by tens of millions of Americans outside their homes during work, meals, studies, medical care and play.”²⁷ Thus, when the Commission plans for the digital transition, it must take into account not only exclusively over-the-air households, but also the millions of sets in MVPD homes that rely only on over-the-air analog service.

C. Preserving Over-The-Air Television Serves The Interests Of 100% Of The American Public

The reasons the Commission should preserve over-the-air television extend beyond ensuring service for over-the-air viewers, whether in non-subscriber homes or on

²⁶ NAB/MSTV at Attachment at 6 (estimating 28.1 million unwired (OTA) sets in MVPD households). *See also* CEA at 4 (“[E]ven in cable and/or satellite households, not every television in the household may be connected to these services. This reflects the household’s conscious decision whether or not to connect.”); Sinclair at 3 (“Approximately 33 percent of the respondents [to a survey conducted by Sinclair] live in households with at least one television that is used exclusively for free, over-the-air analog reception. . . . [T]his amounts to more than 35 million households with at least one television used exclusively for free, over-the-air analog reception. Approximately 20 percent of all televisions are used exclusively for free, over-the-air analog reception. . . . [T]his amounts to more than 65 million televisions which are used exclusively for free, over-the-air analog reception.”).

²⁷ Envisioneering at 3.

second and third sets. As various commenters and the FCC have pointed out in other proceedings,²⁸ broadcast television serves as the ultimate competitive check, to the benefit of all consumers, on cable prices and other cable practices. For example, several minority and children's programming groups have pointed out that their program offerings, shut out by the pay services, may find an outlet in free television.²⁹ This increasingly important function of over-the-air television must keep pace. Broadcasting has the opportunity to use digital capabilities like multicasting to better compete with cable and DBS in a multichannel world. This opportunity should be nurtured, not stifled.

All of society benefits from an informed electorate, an educated work force and the sense of local and national community and respect for diversity that broadcast television contributes to. In this respect also, all of society benefits from over-the-air service which, in addition, continues to be a "must-have" component of all subscription services, both DBS and cable. One of the parties to this proceeding articulated this point to great effect: "[I]n a free society, it is absolutely essential to provide a mechanism of mass communication that does not limit public access by charging a monthly subscription fee."³⁰

²⁸ *In re* Annual Assessment of the Status of Competition in the Market for the Delivery of Video Programming, *Ninth Annual Report*, ¶¶ 80,82 (2002).

²⁹ See *Ex Parte* submission of the National Medical Association in CS Docket No. 98-120, at 2 (Mar. 31, 2004); *Ex Parte* submission of Minority Media and Telecommunications Counsel in CS Docket No. 98-120 (Jan. 30, 2004); Notices of *Ex Parte* Presentations of DIC Entertainment Corp. in CS Docket No. 98-120 (Nov. 4 & 6, 2003).

³⁰ Comments of Steven R. Bartholomew in MB Docket No. 04-210, at 1-2 (July 12, 2004).

III. The Importance Of OTA Service For News, Information And Emergency Alerts

As NAB and MSTV said in initial comments,³¹ this situation -- the end of analog broadcasting -- has the sure signs of significant disruption. This is not only because of the immense OTA analog audience, but because of the importance significant percentages of consumers attach to local broadcast television for news and information about public affairs, current events and emergencies. *Id.*

Over-the-air broadcast service is in fact essential to public safety. As Homeland Security Secretary Tom Ridge emphasized, “obviously television and radio” are “the first choice” for providing information to the public during a terrorist attack.³² A vibrant over-the-air network is also essential during weather-related or other emergencies when cable or DBS service may be lost. The fact is television coverage of Hurricane Charley saved lives.³³ Although cable and satellite subscribers may not appreciate it until their cable or satellite service is knocked out by a powerful storm, they are assured of, and benefit from access to, over-the-air signals. In such situations it is essential for them to be able to receive vital public safety and other information via over-the-air television, which remains the single most important, though underappreciated, information safety net for all Americans in times of crisis, local or national.

³¹ NAB/MSTV at 2.

³² PBS Online News Hour, Newsmaker: Tom Ridge, Feb. 19, 2003, available at http://www.pbs.org/newshour/bb/terrorism/jan-june03/ridge_2-19.htm.

³³ See Letter from Eddie Fritts, National Association of Broadcasters and Pat Roberts, Florida Association of Broadcasters to FCC Chairman Michael Powell, Aug. 17, 2004.

Other commenters voice similar concerns.³⁴ Capitol Broadcasting stresses the role of broadcast television and over-the-air broadcast television in informing the public, including on issues of homeland security and natural disasters.³⁵ Capitol noted the critical safety information provided by North Carolina broadcasters during a particularly severe hurricane, remaining on the air throughout power and cable outages. *Id.* Disney/ABC says that its OTA-only audience represents a sizable portion of its viewing audience and that they rely on OTA service for their broadcast news and information.³⁶

Entravision notes that nearly 50 percent of Hispanic households watch only Spanish-language programming and that many of these households still exclusively view Spanish-language news and entertainment programs on analog-only sets.³⁷ Given this, Entravision declares that the public interest in promoting accessible media and an informed citizenry through news, information and public affairs programming justifies special Commission consideration of Spanish-language over-the-air viewers.³⁸ It states that these public interest concerns are even more pressing in connection with communities near the U.S.-Mexico border, where the availability of signals from Mexican television stations dilute Hispanic viewers' interest in and need for U.S. stations and their program offerings, including their news and public affairs programming. *Id.*

Univision stresses that loss of OTA analog service will jeopardize the health and lives of millions by the loss of emergency information, severe weather alerts and

³⁴ Many individuals filed comments in this proceeding voicing strong support for over-the-air television reception. *See, e.g.*, Comments of Chris Llana, July 6, 2004; Gary Seleski, July 6, 2004; Albert Manfredi, June 30, 2004; Bill Keough, June 11, 2004; Michael J. Martell, June 7, 2004; Mike Petrozello, July 19, 2004.

³⁵ Capitol at 2-3. *See also* Envisioneering at 3.

³⁶ Disney/ABC at 2.

³⁷ Entravision at 4.

³⁸ *Id.* at 4-5.

breaking news that local broadcast television, and often only local broadcast television, provides.³⁹ In addition, it points out that, with the loss of OTA service, millions will lose access to the single most significant cultural touchstone in the United States⁴⁰ and millions of children will lose access to education programming. *Id.* at 3. Univision emphasizes that, while it has no interest in operating both analog and digital facilities for its stations one day longer than necessary, it must bear these dual operating costs to ensure that all of its viewers continue to have access to news, educational programming, community information and emergency and weather alerts until they are all equipped to obtain this information through DTV signals. *Id.* at 15.

Thus, the critical importance of OTA analog television service to viewers should not be overlooked by the Commission when reviewing Motorola's call in this proceeding for an early date certain to the digital transition and the early clearing of television operations from the 700 MHz spectrum where TV channels 62-65 and 67-69 operate, to enable deployment of nationwide public safety systems in that band.⁴¹ While public safety systems are indeed critical to the public, particularly in today's world, the

³⁹ Univision at 2.

⁴⁰ Echoing this sentiment, the Minority Media and Telecommunications Council comments: "nothing holds Americans together like universal television service. Television is the most influential force driving our cultural values and norms, our language and dialects, and the information we carry into the voting booth. The exclusion of the least fortunate Americans from the community of television viewers would even further deepen America's seemingly intractable social class divisions. It matters to all of us whether low-income families receive accurate and timely information about jobs, health care, school closings and homeland security. It matters to all of us that every American can watch when our candidates for elected office advertise or debate." Comments of Minority Media and Telecommunications Council ("MMTC"), MB Docket No. 04-210, August 11, 2004 at 2 (quoting Comments of Civil Rights Organizations, MB Docket No. 03-15, April 21, 2003).

⁴¹ Comments of Motorola, Inc. ("Motorola"), MB Docket No. 04-210, August 11, 2004 at 2-5.

comments in this proceeding, discussed above, demonstrate that so too is OTA television critical to viewers for news, information and emergency alerts. Motorola's attempt to diminish the numbers of viewers affected, *id.*, cannot diminish the importance of critical emergency information, as well as news and information, getting to those viewers. And, its attempt to reduce the numbers of affected viewers by showing the percentage of viewers watching these stations via cable⁴² ignores the reality that if these stations have no where to go until the repacking of stations is complete, they will not be available via cable either. What Motorola refers to as "this minor dislocation," *id.*, is critical, and even life-threatening, for those viewers affected. It would be ironic indeed if public safety concerns were the cause of the loss of critical emergency information for viewers relying on television for health and welfare information, not to mention other important news.

IV. The Digital Transition For OTA Viewers

Given the immense size and importance of the OTA-only audience and the unavoidable dislocation caused by the end of analog broadcasting, it is no wonder that Univision urges that the digital transition be allowed to occur on a natural timetable dictated by the public's actual adoption of DTV technology.⁴³ One would have hoped that, by the time of the cessation of analog broadcasting, a "true" 85% of households would be "digital" and that digital sets would be affordable enough that the remaining households could afford to purchase them and join the digital television revolution. But

⁴² *Id.* at 5.

⁴³ Univision at 1-3.

without achieving mass quantities and economies of scale, the prices of digital sets will not have dropped enough for the remaining consumers to purchase them.⁴⁴

Thus, the Commission and the Congress should continue to pursue a true digital transition, for the benefit of all consumers, particularly those with lower incomes, and adopt policies that will foster that true digital transition. Paramount among those policies is cable carriage of digital broadcast signals, and, as well, eventual satellite carriage of digital broadcast signals under “carry-one/carry-all.” Several commenters join NAB and MSTV in urging digital cable carriage obligations, among them Paxson Communications, Univision and APTS.⁴⁵

But, as NAB and MSTV recognized in our initial comments, in the end, some plan to mitigate disruption of television viewing on analog sets, particularly in OTA-only households, must be undertaken.⁴⁶ Other broadcasters concur, and support a government subsidy of converters for OTA-only households or OTA sets.⁴⁷ And many commenters also support a subsidy for converters from revenues from future spectrum auctions.⁴⁸

⁴⁴ Sinclair, at 7, even goes so far as to pronounce the digital transition “a complete and abject failure” if analog households count towards the 85 percent test by simply receiving a downconverted digital signal from an MVPD.

⁴⁵ Paxson at 7-10; Univision at 15; APTS at 15, 21-23.

⁴⁶ NAB /MSTV at 9-10.

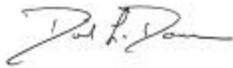
⁴⁷ APTS at 16-21; Entravision at 4; Univision at 11.

⁴⁸ Univision at 11; MMTC at 3; Motorola at 3, 8; Comments of the 700 MHz Advancement Coalition Regarding Over-the-Air Broadcast Television Viewers, MB Docket No. 04-210, August 11, 2004 at 2, 4; Comments of Aloha Partners Regarding Over-the-Air Broadcast Television Viewers, MB Docket No. 04-210, July 12, 2004 at 4, 5; Comments of Whidbey Telephone Company, MB Docket No. 04-210, July 9, 2004 at 2; Comments of Citizens Telephone Cooperative, MB Docket No. 04-210, July 12, 2004 at 1-2; Comments of 3G Comm, LLC, MB Docket No. 04-210, June 24, 2004 at 1; Comments of Peñasco Valley Telecommunications, MB Docket No. 04-210, July 7, 2004 at 1-2; Comments of Acumen, MB Docket No. 04-210, June 24, 2004 at 1; Comments of Red River Telephone, MB Docket No. 04-210, June 28, 2004 at 1-2; Comments of North Dakota Network Company, MB Docket No. 04-210, June 29, 2004 at 1-2; Comments of

Hopefully, the Commission's initiatives of mandated DTV tuners, OTA tuners in cable-ready DTV sets, the coming emphasis for DTV consumer education and the broadcast of network HDTV prime-time programs and specials, such as the recent Olympics, will result in millions of DTV purchases by the time any plan shortening the market-based DTV set penetration mark for ending analog broadcasting is effectuated. But, in the end, inexpensive converters, noted by several commenters as expected in a few years,⁴⁹ seem to be the key to accommodate those who cannot afford a true digital television when analog broadcasting is ended.

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Polar Communications, MB Docket No. 04-210, July 6, 2004 at 1; Comments of Cameron Communications, MB Docket No. 04-210, June 30, 2004 at 1-2; Comments of Dickey Rural Networks, MB Docket No. 04-210, June 21, 2004 at 2; Comments of Kennebec Telephone Co., Inc., MB Docket No. 04-210, June 21, 2004 at 1-2; Comments of Webster-Calhoun Cooperative Telephone Association, MB Docket No. 04-210, June 21, 2004 at 2; Comments of Ponderosa Telephone, MB Docket No. 04-210, July 8, 2004 at 1-2.

⁴⁹ Motorola at 3, 7; Comments of Radioshack Corporation on Over-the-Air Television Viewers, MB Docket No. 04-210, August 11, 2004 at 7-8; Comments of LG Electronics U.S.A., Inc., MB Docket No. 04-210, August 11, 2004 at 2.