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December 22, 2004

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20445

Re: MB Docket 04-233
Broadcast Localism

Dear Ms. Dortch:

Attached is a commentary written by Mr. Michael Silbergeid relating his personal experience with local television and radio during the hurricanes that hit Florida earlier this year. We believe this is an important illustration of how free over-the-air television and radio is invaluable to the public, especially in weather emergencies, and would like to have it entered into the above-mentioned docket.

Thank you for your attention to this matter. Please direct any questions to the undersigned.

Respectfully submitted,

A handwritten signature in cursive script that reads "Marsha J. MacBride".

Marsha J. MacBride



COMMENTARY

by Michael Silbergleid

Free Over-The-Air Saves The Day

While *DigitalTV's* main editorial offices are located in New York City, I live and work in Palm Beach County, FL.

Yes, Florida. "The Plywood State." Land of mostly sunshine and most recently hurricanes...lots of hurricanes.

Before the four horsemen of the apocalypse (Charley, Ivan, Frances, and Jeanne) descended on Florida, plans were already in place for how the media would cover them. Television stations not only simulcast on radio and combined coverage with other stations in the market to double their newsgathering abilities, but also simulcast on stations without their own news outlets (like WB, UPN, and PAX affiliates). Of course, stations had to stretch the coverage out while waiting for slow-moving Frances to make landfall and more than one meteorologist went goo-goo ga-ga for his Doppler radar, but local television did what local television does best—local coverage of an emergency.

I'm writing this part of my commentary during Frances, in the dark, with battery power on my laptop, as we lost power about an hour ago. When I woke up this morning and still had power, my wife and I turned on the TV and guess what? The cable was out. With the amount of rainfall we were getting my DirecTV service was not much better (did I still have a dish attached to my house?). So I switched over to DTV and my trusty over-the-air antenna mounted in my attic. No worries. I learned what I needed to know, including that my house would be subject to hurricane-force winds

Over-The-Air: Why So Important?

"Over-the-air broadcast service is in fact essential to public safety...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."

—*"Over-The-Air Broadcast Television Viewers"* (MB Docket No. 04-210)
Reply Comments of the National Association of Broadcasters and the Association for Maximum Service Television, Inc.

for at least another seven hours until the eye was overhead, and then I would have to deal with the tail end of the hurricane for another 10 hours.

The fact that I have over-the-air DTV is just a convenience. When the power gave out and the UPS feeding the DTV and the STB shut itself down, I did what almost all Floridians do—I switched to a battery operated analog TV/radio and more over-the-air.

Yes, the all-news radio stations did a great job—many by simulcasting TV. But here's the thing: During weather emergencies, there is only one place folks can see Doppler radar to know where the hurricane is at any moment—free over-the-air TV.

It doesn't matter how much penetration cable has when the cable's out. Free over-the-air saves lives.

Michael Silbergleid is the editor. He can be reached at msilbergleid@cmpinformation.com.

720p vs 1080i...Again

Having lived through the 720p vs. 1080i wars in the U.S., it's interesting to see our neighbors across the pond now racking the same issues, as Europe's EBU HD "work in progress" leans toward 720p and others push their 1080i agenda. It certainly made IBC more interesting, with public posturing and private demonstrations.

The difference this time is that the European battle revolves around a different television philosophy than the one in the States. In the U.S., television is about television—traditional pictures and sound. In Europe, television is a bundle of different services, of which high definition will be just one offering used to attract viewers (and their eyeballs to advertisers). Therefore, it would seem appropriate for European broadcasters to

want a high definition service that requires the least amount of bandwidth.

There's no arguing that 1080i/50 has more picture resolution than 720p/50 (unless you want to argue that 1080i/50 is really 540p/100). There's also no arguing that 720p provides just 95 more lines of resolution than the current 625 PAL standard (unless you argue that 625/25 PAL is really 312.5p/50, in which case the 720p/50 HD service would have more than twice the resolution of today's standard definition picture).

There's also no arguing that progressive is easier to compress than interlace, home displays are moving away from interlace toward progressive, and that interlace artifacts such as temporal distortion between fields making up a frame can soften the picture—especially during camera moves, zooms, and rapid subject movement. —M/S