

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the matter of)	
)	
Requirements for Digital Television Receiving)	ET Docket No. 05-24
Capability)	MB Docket No. 03-15

**COMMENTS OF THE ASSOCIATION OF PUBLIC TELEVISION
STATIONS**

The Association of Public Television Stations (“APTS”)¹ hereby submits Comments in the above captioned proceeding. On June 9, 2005, the Commission maintained its requirement that 50 percent of 25-36” receivers include DTV tuners beginning July 1, 2005 but modified the date on which 100 percent of such receivers must include DTV tuners by advancing that date from July 1, 2006 to March 1, 2006.² Consistent with its goal to provide DTV reception to consumers as rapidly as possible, the Commission has also proposed to advance the date on which all new television receiving equipment must include the capability to receive over-the-air DTV broadcast signals from July 1, 2007 to a date no later than December 31, 2006.³ The Commission also asked for comment on whether the requirement to include a DTV tuner in new receivers should be extended to receivers with screen sizes less than 13” inches.⁴

¹ APTS is a nonprofit organization whose members comprise the licensees of nearly all of the nation’s 357 CPB-qualified noncommercial educational television stations. APTS represents public television stations in legislative and policy matters before the Commission, Congress, and the Executive Branch and engages in planning and research activities on behalf of its members.

² Requirements for Digital Television Receiving Capability, Report and Order and Further Notice of Proposed Rulemaking, FCC 05-121, ¶ 1 (June 9, 2005).

³ Id. at ¶ 2.

⁴ Id. at ¶ 22.

APTS supports any reasonable tuner mandate schedule that ensures that consumers will be able to receive free, over-the-air digital signals without having to subscribe to either cable or satellite. Additionally, APTS submits these comments to suggest that additional measures may be needed to ensure a smooth transition from analog television broadcasting to a fully digital infrastructure. Specifically, APTS believes that a comprehensive and coordinated public outreach and education effort is required to ensure a successful transition to digital television.

In this regard, an instructive model comes from Britain, which has recently established an independent corporation, called “SwitchCo,” to coordinate a comprehensive publicity campaign and to manage the digital switchover process. In a similar vein, the United States should establish an independent quasi-governmental corporation to comprehensively oversee the public relations aspects of the cessation of analog broadcasting. It should establish a SwitchCoUSA.

To ensure adequate, consistent, comprehensive and unbiased publicity, the public relations duties should not be left without supervision to the diverse and often conflicting commercial interests in the free market. On the other hand, the flexibility and sensitivity to local conditions may be difficult to accomplish by a single governmental agency. Accordingly, a quasi-governmental entity, modeled perhaps along the lines of the Corporation for Public Broadcasting, the National Science Foundation, or the National Endowment for the Humanities, may be more appropriate. In addition, to ensure local responsiveness while adhering to national policy, SwitchCoUSA could employ regional or state councils to further inform its efforts.

As part of its duties, SwitchCoUSA would be primarily tasked with communicating to communities the relevant shut-off dates and the means by which consumers could preserve television service. SwitchCoUSA and its component local affiliates would extensively use

established marketing tools, including electronic mass media and other available means to disseminate appropriate information regarding analog cessation. SwitchCoUSA could also work cooperatively with industry partners to encourage a consistent message in the private sector, encourage adequate training by retail staff, and ensure the availability of appropriate equipment.

If adequate funding is available, APTS pledges to assist in the development and success of SwitchCoUSA. Moreover, APTS also stands ready to lead a coalition of interested industry partners, public interest groups, advocacy organizations, content providers, commercial broadcaster and others to step into this role of leading the digital transition consumer campaign. In fact, APTS is currently trying to bring the various players together to voluntarily form a SwitchCoUSA. APTS will continue to refer to the FCC any progress made in this regard in addressing the need for planning and consumer outreach among broadcast, equipment and other industry players in the digital transition.

With adequate resource support and the cooperation of key partners, APTS could design an effort that has three related elements to ensure a successful DTV transition:

- Public television public service announcements, as well as paid advertising on commercial media;
- Community outreach and public relations (including but not limited to working with commercial partners, including equipment retailers, commercial television stations, schools, newspapers, social organizations, etc.); and
- Targeted technical assistance for the installation of basic digital-to-analog converters (including but not limited to the use of a call center and service calls to homes).

Conclusion

APTS supports any reasonable tuner mandate deadlines that the Commission may impose. More importantly, APTS suggests the creation of a comprehensive and coordinated public outreach and education effort under the aegis of an independent quasi-governmental entity. APTS stands ready to lead this initiative with key industry partners, provided that adequate resource support is provided.

Respectfully submitted,

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APPENDIX A – Press Release, SwitchCo, United Kingdom

SwitchCo

Press Release

SWITCHCO LAUNCHES TODAY 13 April 2005

SwitchCo, the organisation which will co-ordinate the country's switchover to digital television, launches today, marking a major step on the road to a totally digital UK.

SwitchCo has been formed at Government request by the public service broadcasters BBC, ITV, Channel 4, five, Teletext and S4C and the digital terrestrial television multiplex operators Crown Castle UK Ltd and SDN, all of whom are represented on its management board and provide funding. Also on the board are two positions representing the interests of the supply chain (television equipment manufacturers, retailers and aerial manufacturers and installers). SwitchCo will work closely with the DCMS, the DTI and Ofcom.

Barry Cox, previously acting Chairman of the SwitchCo working group, is Chairman of the new company. Ford Ennals, previously Managing Director of Universal Group Direct, the direct marketing division of Universal Music, will be Chief Executive, taking up his post in May. Andy Townend, previously acting Chief Executive of the SwitchCo working group, is Director of Commercial & Business Affairs, reporting to Ennals.

Barry Cox, SwitchCo Chairman, said: "Communicating switchover to the UK public needs the leadership of someone with a strong background in marketing and communications. Ford Ennals' experience in launching the new LloydsTSB brand, and his overseeing of the successful merger and integration of the two banks, makes him ideal to head the organisation."

Ford Ennals, SwitchCo Chief Executive, said: "Digital television is a great UK success story - almost 60% of households have already made the switch. But moving the whole country to digital will be a great challenge. My first task will be to start a dialogue with television viewers, consumer groups and other important stakeholders to get their views so we can begin to shape our communication plans."

SwitchCo has three major tasks:

- To co-ordinate the technical roll out of digital terrestrial television across the UK, region by region, to a timetable agreed by Government.
- To communicate with the public about digital switchover to ensure everyone knows what is happening, what they need to do, and when.
- To liaise with TV equipment manufacturers, retailers, digital platform operators and consumer groups to ensure understanding of and support for the switchover programme.

SwitchCo is an impartial, not-for-profit organisation and will inform consumers of all their options to receive digital television, whether through an aerial (digital terrestrial) or via cable, satellite or DSL (TV through a telephone line).

13 April 2005

www.switchco.co.uk

NOTES TO EDITORS

- Switchover will involve the phasing out of existing analogue terrestrial television transmissions and replacing them with digital. This will be done on a region by region basis, to a timetable agreed by Government.
- In February 2005 Ofcom indicated that digital switchover could start in 2008 and finish in 2012. The final date will be agreed with Government and broadcasters.
- SwitchCo takes forward the work of the Government's Digital Television Action Plan (DTAP), completed in December 2004.
http://www.digitaltelevision.gov.uk/dtv_project/project_details_home.html
- A SwitchCo Working Group has been operating since October 2004, prior to the official incorporation of the company.
- The BBC will be required to implement digital switchover under the terms of its Royal Charter, as set out in the recent Government Green Paper www.bbccharterreview.org.uk/home/background.html The other public service broadcasters (ITV, Channel 4, five, S4C and Teletext) are legally obliged to fulfil the digital switchover obligations contained within their Digital Replacement Licences (DRLs), issued by Ofcom at the end of 2004. Multiplex operators Crown Castle UK Ltd and SDN are regulated by Ofcom and are essential partners for the technical roll out of digital terrestrial.

BIOGRAPHIES

Barry Cox, Chairman, SwitchCo

Barry Cox worked as a journalist on the Scotsman, the Sunday Telegraph, Granada's World In Action and at LWT, where he became Controller of Features & Current Affairs, and then Director of Corporate Affairs. He was Director of the ITV Association between 1995 and 1998, and is now Deputy Chairman of Channel 4 and a consultant with ITN. He was chairman of the Digital TV Stakeholders Group between 2002 and 2004 and the News International Visiting Professor of Broadcast Media at Oxford University in 2003. He has been Chairman of the SwitchCo working group since October 2004.

Ford Ennals, Chief Executive, SwitchCo

Ford Ennals has been Managing Director of Universal Group Direct, the direct marketing division of Universal Music, and Chief Marketing Officer of the group in Britain since 2002. Prior to that he was Group Marketing Director of the LloydsTSB group, where he was responsible for the launch of the LloydsTSB brand and the successful integration of the two businesses after merger. His extensive career in marketing has also included positions as Global Marketing Director of British Airways; Senior Vice President, Worldwide Marketing for Reebok; and Brands Director for Mars in both the UK and the USA.

Andy Townend, Director of Commercial & Business Affairs, SwitchCo

Andy Townend has been Acting Chief Executive of the SwitchCo working group since October 2004. Before taking up that role he was Controller of Distribution at the BBC, where he was responsible for the delivery of all the BBC's television, radio and interactive services to licence fee payers. He was a key member of the BBC team which worked on the launch of Freeview, chaired The Digital Network, and represented the BBC as a council member of the Digital Television Group and during the development of the Government's Digital Television Action Plan.

[Please download a copy of this Press Release in PDF format here](#)

<http://www.switchco.co.uk/pressrelease.htm>