

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of )  
 )  
Measurement Standards for Digital Television )  
Signals Pursuant To the Satellite Home ) ET Docket No. 06-94  
Viewer Extension and Reauthorization of )  
2004 )

To: The Commission

**COMMENTS OF THE  
CONSUMER ELECTRONICS ASSOCIATION**

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The Consumer Electronics Association (“CEA”) respectfully files these Comments in response to the Commission’s Notice of Proposed Rulemaking (“NPRM”) in the above-captioned proceeding.<sup>1</sup> CEA is the principal U.S. trade association of the consumer electronics and information technologies industries. Its members design, manufacture, distribute and sell a wide range of consumer products including digital and analog television receivers, television monitors, computer television tuner cards, and associated electronics such as DVD recorders and digital video recorders (“DVRs”), video cassette recorders (“VCRs”), direct broadcast satellite radios (“DARS”), satellite television receivers (“DBS”), broadcast AM and FM radios, and similar products. CEA’s more than 2,100 member companies include the world’s leading consumer electronics manufacturers.

As CEA discussed in its comments regarding the Commission’s Notice of Inquiry (“NOI”) last year, CEA supports the FCC’s reliance on the modified Longley-Rice model as a

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<sup>1</sup> *In the Matter of Measurement Standards for Digital Television Signals Pursuant To the Satellite Home Viewer Extension and Reauthorization Act of 2004*, ET Docket No. 06-94, FCC 06-51 (rel. Apr. 28, 2006) (“NPRM”).

tool for evaluating the field strength of a particular DTV station at a specific location.<sup>2</sup> Moreover, as previously stated, CEA does not wish to recommend specific rules changes related to determining whether a household is unserved by a DTV signal.<sup>3</sup> CEA strongly believes, however, that the Government's involvement in this matter should remain limited and narrowly tailored.<sup>4</sup>

CEA also advocates the establishment of a single definition of the service area for each analog and digital TV station, as determined by the Commission.<sup>5</sup> Today, two definitions exist: the Grade B contour and the DTV noise-limited service contour. In establishing one, consistent definition, consumers can avoid a scenario in which they are told that they can receive a weak local station (based on field measurement), yet the same broadcast channel could be occupied by a nearby unlicensed transmitter (based on Grade B contour) and, therefore, rendered unusable."<sup>6</sup>

As suggested in CEA's NOI comments, the Commission has raised certain issues, including antenna type and placement, which should not be considered as part of a rulemaking.<sup>7</sup> In determining whether a household is served, it is sufficient for the FCC to evaluate the given field strength at a known height above the location using the predicted or measured methodology.<sup>8</sup>

### **Comments on Specific Factors Raised by this Proceeding**

In this NPRM, the FCC requests comment on its proposal to require "digital television measurement be made with a horizontally polarized antenna" and to "require that the testing antenna be oriented so that its maximum gain (over an isotropic antenna) faces the strongest

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<sup>2</sup> Comments of the Consumer Electronics Association, *Technical Standards for Determining Eligibility For Satellite-Delivered Network Signals Pursuant To the Satellite Home Viewer Extension and Reauthorization Act*, ET Docket No. 05-182 (FCC filed June 17, 2005)("CEA NOI Comments"), at 1.

<sup>3</sup> See CEA NOI Comments, at 1.

<sup>4</sup> See *id.*, at 3.

<sup>5</sup> See *id.*, at 1.

<sup>6</sup> *Id.*, at 2.

<sup>7</sup> See *id.*, at 3.

<sup>8</sup> See *id.*

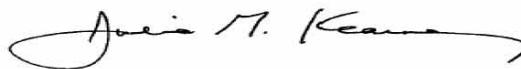
signal coming from the transmitter under test.”<sup>9</sup> CEA believes antenna type and placement is a critical factor in DTV reception and the FCC’s recommendation is sufficient to meet these needs.

In determining whether a household is unserved by an adequate digital signal under section 119(d)(10) of title 17, United States Code, CEA remains supportive of using a predictive methodology. The predictive methodology benefits all parties involved and reduces the burden of whether a household is unserved.<sup>10</sup>

### **Conclusion**

For the reasons expressed herein, CEA recommends that the FCC focus its attention on a consistent definition of served households based on field strength at the location, improvement of the Longley-Rice model if needed, a simplified method for signal strength tests and refinement of measurement procedures to accommodate the specific nature of DTV signals. Further, CEA fully supports the Commission’s call for Congress to recognize digital predictive modeling in determining whether a subscriber is “unserved” by digital signals.<sup>11</sup>

Respectfully submitted,



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<sup>9</sup> See *NPRM* at para. 12.

<sup>10</sup> See CEA NOI Comments, at 4.

<sup>11</sup> See *Report to Congress: Study of Digital Television Field Strength Standards and Testing Procedures*, 20 FCC Rcd. 19504, 19570 (“Digital Testing Report”).