

transition to digital television, supplying the majority of the digital radio and television transmitters and encoders in the United States.

II. PSIP COMPLIANCE DATE SHOULD BE REVISED

Harris commends the Commission for its diligent work in ensuring that the transition to DTV is one that is completed as expeditiously as possible and in a manner that serves the best interests of American consumers.

However, Harris is concerned that the rule adopted in the 3rd Report & Order on the PSIP standard provides for an unrealistic timeframe for compliance.

In paragraph 185 of the 3rd Report & Order, the Commission noted:

We find that the updated ATSC PSIP standard enhances consumers' viewing experience by providing detailed information about digital channels and programs, such as how to find a program's closed captions, multiple streams and V-chip information. Therefore, in order to give broadcasters adequate time to come into compliance, this requirement will take effect 120 days after publication in the Federal Register.¹

Broadcasters will not be able to implement the ATSC PSIP standard adopted in the 3rd Report & Order by May 30, 2008 because the product is unavailable. Harris is in the process of testing a new product which will enable automated updating of PSIP information from its ADC Automation System (the most widely deployed Master Control Automation System in the US) to the station's PSIP generator, enabling broadcasters to comply with this rule.

¹ 3rd Report & Order, paragraph 185.

However, this product is not expected to be generally available to US broadcasters until mid-2008. Deploying this software at the hundreds of US over the air ADC stations will take at least one full year, as it not only requires the installation of new software products at these stations, but also requires that these stations upgrade to the latest versions of their automation systems as well as their PSIP Generators. With both of these being mission-critical on-air systems, such upgrades must be carefully planned and executed.

Therefore, Harris requests that the date by which broadcasters are required to dynamically update their PSIP information be shifted to a more achievable date of May 30th, 2009.

Respectfully Submitted,

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