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

In the Matter of	)	
	)	CS Docket No. 98-120
Carriage of Digital Television Broadcast	)	
Signals: Amendment to Part 76 of the	)	
Commission's Rules	)	

COMMENTS OF NBC UNIVERSAL, INC. AND NBC TELEMUNDO LICENSE CO.

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SUMMARY

The February 2009 transition to digital television will be deemed successful only if consumers perceive that they have benefited from the transition. Consumers who are denied the full features and functionality of any programming, including video, audio and technical data, being retransmitted by multichannel video programming distributors ("MVPDs") are far less likely to appreciate the benefits of the digital transition. Moreover, unless MVPD downconversion from high-definition ("HD") to standard-definition ("SD") or analog-compatible television follows certain technical guidelines, the downconverted programming may not provide the program content, capabilities or quality that otherwise would be available to the consumer.

One practical example of what may be lost through incomplete or improper downconversion is whether MVPDs effectuate or pass through to subscribers video data such as the Active Format Description ("AFD"). AFD directs, as part of the downconversion process, how best to reformat HD programming that will be displayed on television equipment with a 4:3 aspect ratio. The failure by a cable operator to effectuate AFD (in the case of headend downconversion of an HD signal) or to pass through AFD (in the case of home downconversion) will mean that a consumer may lose important information or other video available to an over-the-air consumer.

Another example is the potential degradation of digital audio. An improperly downconverted signal could cause consumers to lose dialogue transmitted via digital audio's center channel. It also could upset the volume ratio of soft and loud sounds if cable operators do not use proper Dolby Digital/ATSC dynamic range profiles or interfere with SAP data.

A third example is the potential loss of technical broadcast data during downconversion. The Commission should clarify or confirm that it expects cable operators to include as part of any downconversion or retransmission of local television programming all data traditionally carried in the data portion of the analog signal in the vertical blanking interval – including data noted in prior Commission orders such as V-chip, Nielsen or closed captioning data – or in the ATSC Program System and Information Protocol ("PSIP").

The Commission has established statutory authority to promulgate these sorts of narrow and specific technical requirements relating to the appropriate carriage of local digital signals under several provisions of Sections 614 and 615. Such requirements also are consistent with past technical specifications with respect to retransmitted broadcast content on cable systems. Accordingly, the Commission should update its technical baselines for digital downconversion and retransmission in order to ensure consumers are not short-changed by the nation's transition to digital television broadcasts.

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NBC TELEMUNDO LICENSE CO.

The February 2009 transition to digital television will be deemed successful only if consumers perceive that they have benefited from the transition. Consumers who are denied the full features and functionality of any programming, including video, audio and data, being retransmitted by multichannel video programming distributors ("MVPDs") are far less likely to appreciate the benefits of the digital transition, notwithstanding the immense and ongoing investments made by broadcasters and MVPDs to prepare for the February 2009 full-power digital broadcast conversion. Consumers who receive their local television stations through MVPD services depend on their MVPDs to retransmit or downconvert local broadcasts in a manner that will enable these subscribers to enjoy the same features, information and quality as over-the-air viewers who are receiving or downconverting digital signals in their homes. Unless MVPD downconversion from high-definition ("HD") to standard-definition ("SD") or analog-compatible television follows certain technical guidelines, however, the programming may not provide the program content, capabilities or quality that otherwise would be available to the consumer.

One practical example of what may be lost through incomplete or improper downconversion is whether MVPDs effectuate or, in the case of downconversion in a subscriber's home, pass through to the home technical data such as the Active Format Description ("AFD"). AFD is an active control of the aspect ratio of the picture that is part of the ATSC standard. It directs, as part of the downconversion process, how best to reformat HD programming that will be displayed on television equipment with a 4:3 aspect ratio. The failure by a cable operator to effectuate and implement AFD (in the case of headend downconversion of an HD signal) or to pass through AFD (in the case of home downconversion) will mean that a consumer, including one with all the necessary technology to reformat a 16:9 digital program to a 4:3 program in his or her home, may be left with a truncated video screen in lieu of the full-screen picture intended by the creator of the programming. In some circumstances, the consequences may be even more dire than the unmistakable loss of quality that was supposed to be a prime benefit of the transition to digital; truncation of the video screen may cause some consumers to lose access to real-time emergency information that would have been viewable if AFD had been passed through as broadcast.

The above-captioned *Notice* requested parties to comment on how cable operators should be required to address certain technical issues relating to the downconversion or retransmission (for home downconversion) of all broadcast signals subject to material nondegradation requirements.[1] NBC Universal, Inc. and NBC Telemundo License Co.

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[1] *Third Report and Order and Third Further Notice of Proposed Rulemaking* in CS Docket No. 98-120 (rel. Nov. 30, 2007) (separately, "*Order*" and "*Notice*"). In the *Order*, the Commission specified that cable operators may choose how to deliver local HD broadcast signals to a non-HD-compatible receiver: either by downconverting HD broadcast programming to a format accessible to SD and analog receivers and then transmitting the downconverted

(collectively, "NBCU") submit these comments in order to encourage the Commission to require the appropriate downconversion (or retransmission to the consumer in the case of home downconversion) by a cable operator of important video, audio and other technical data – to the extent a broadcaster includes such data in its signal – so that consumers may participate in the benefits of the nation's transition to digital without unnecessary material degradation of their viewing experience.

I. DIGITAL BROADCASTS THAT ARE BEING RETRANSMITTED OR DOWNCONVERTED BY CABLE OPERATORS SHOULD NOT BE STRIPPED OF VIDEO, AUDIO OR OTHER TECHNICAL DATA RELEVANT TO THE APPEARANCE OR FEATURES OF THE BROADCAST

In the *Notice*, the Commission asks several questions regarding the implementation of the technical carriage requirements of local digital television broadcasts. The *Notice* specifically addresses aspect-ratio issues, which is one element of the delivery of the video component of a local station's digital signal to certain cable subscribers. Other categories of data relating to programming that an MVPD is carrying, such as audio or V-chip data, merit similar consideration. How these significant technical details are addressed will define the extent of many consumers' enjoyment of post-transition television, especially for those millions of consumers who will rely on digital signals transmitted by an MVPD that must be downconverted before they may be viewed by the consumer.

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programming to non-HD consumers (*e.g.*, "headend downconversion") or by ensuring that all viewers on a system can downconvert HD signals to an accessible format within the viewers' homes ("home downconversion"). *See id* at ¶¶ 18-19. To the extent these comments propose Commission requirements for cable operators, they intend that a cable operator either should implement these proposals with respect to headend downconversion itself or should pass through the necessary information – such as AFD – to a consumer engaging in home downconversion. Indeed, some consumers may rely on both headend and home downconversion: headend for their television receivers, and home for non-HD digital equipment like a DVD recorder.

A. AFD Implementation or Pass-Through by MVPDs Will Determine What Many Consumers Will Be Able to See Following the Digital Transition

The *Notice* correctly identifies that aspect-ratio reformatting during downconversion is a critical factor in determining a consumer's ability to enjoy downconverted programming.[2] U.S. broadcasters' high-definition digital ("HD") formats are either 1920 x 1080 or 1280 x 720 (expressed as horizontal pixels times vertical lines) and are presented on a widescreen picture with a 16:9 aspect ratio. In order to be converted to video accessible to viewers without HD-ready equipment, these HD formats must be reduced in resolution by filtering and resampling to produce signals in the 480-line interlaced, 4:3 aspect-ratio format that is the technical standard for standard-definition digital and NTSC analog signals.

How aspect-ratio downconversion is handled, either by an MVPD or within a consumer's home, determines how much and what portions of a picture a non-HD consumer ultimately will be able to see. In the case of *center-cut*, both the left and right sides of the widescreen picture are chopped off and discarded, resulting in a loss of 25% of the original HD picture content. (As an example, in a center-cut picture, only a 1440 x 1080 (or 960 x 720) portion of the HD signal may be converted to fit in the 720 x 480, 4:3 aspect ratio SD signal – filling the screen, but losing 25% of the picture.) In the case of *letterboxing*, the *entire* widescreen picture is shrunk to fit the screen, but black bars at the top and bottom are inserted to ensure that the visual image has a 4:3 aspect ratio.

What reformatting is appropriate depends significantly on the variables unique to each program or programmer and is thus best determined by the programmer. Different

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[2] *See Notice* at ¶ 77 (asking whether broadcaster or cable operator should decide how aspect-ratio reformatting is handled as well as "any other" proposals relating to aspect ratio and downconversion issues).

types of content or creative judgments may demand different approaches to downconversion. Some programming may lose important video if center cut; elements of other programming may become too hard to see if reduced by letterboxing, especially on smaller television screens that are not uncommon among analog receivers. In addition, most programs have interstitial programming, such as news updates, public service announcements, or advertising, within a program, and the aspect-ratio strategy for the long-form program may not be suitable for these short-form interstitials within the program, especially as many of these interstitials may appear in other programs with different reformatting preferences.

In recognition of the challenges posed by aspect-ratio reformatting, the Society of Motion Picture and Television Engineers ("SMPTE") has developed a technical standard for AFD that allows the content producer to convey to television receivers or equipment the best aspect ratio to use when downconverting the identified content for viewing on a 4:3 aspect ratio display. Likewise, as the Commission has recognized, the current Advanced Television Systems Committee ("ATSC") broadcast standard enables local stations to transmit the AFD information as part of their over-the-air signals.[3] Although broadcasters are not required to transmit AFD,[4] many are (or soon will). Those consumers who receive the signal over-the-air thus benefit directly from inclusion of AFD in the broadcast data because AFD ensures that the programming – whether long-form or interstitial – is displayed using the aspect ratio best suited to it as determined by the programmer or content creator.

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[3] *See, e.g.*, *Third Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television*, Report and Order, MB Docket No. 07-91, at ¶¶ 183-84.

[4] *See id.*

However, it is not known whether all cable operators are intending to implement AFD as part of headend downconversion and to pass through AFD to their subscribers who will rely on it for home downconversion. Without a requirement that cable operators implement AFD as part of any headend downconversion of a local signal and pass through AFD for home downconversion of a local signal, cable subscribers may not be able to get the same picture they would have received through a downconverted over-the-air signal.[5] Accordingly, the Commission should require every cable system to implement or pass through AFD to the extent AFD is provided as part of the delivered programming of any local station carried by the cable system.

A failure to effectuate AFD provided by local stations to consumers will have adverse consequences for consumers and programmers alike. For consumers who are relying on downconversion of digital programming, their MVPD's treatment of AFD may satisfy - or determine how frustrated - they become with the digital transition mandate. Consumers who experience a partial loss of video content in some programming may not understand the underlying cause, resulting in customer service issues for both cable operators and broadcasters. In some circumstances, consumers may even lose important emergency information if AFD is not implemented or passed through by MVPDs: for example, an emergency news bulletin with information on the side of the screen may appear during broadcast programming that a downstream MVPD elected to center-cut, with the result that subscribers of that MVPD do not see information they would have seen if the MVPD had

[5] Even consumers who receive HD signals on their television sets may benefit from the retransmission of AFD because these consumers may want to transmit an HD signal to downstream devices such as DVD recorders that may not be HD-ready. If AFD data were included in MVPD retransmission, the downstream equipment would correctly perform a downconversion and adjust the aspect ratio appropriately.

instead implemented or transmitted AFD data, rather than imposing a one-size-fits-all downconversion of that station's digital programming.

In contrast, AFD is a flexible way to minimize aspect-ratio issues for consumers. AFD will enable a programmer to choose how a viewer sees the content as opposed to relying on local stations or MVPDs that are less familiar with the content or unable to adjust HD reformatting between the main program and interstitial announcements to determine what sort of non-AFD format to impose on the programming.

For programmers and content creators, a failure to require cable systems to implement or pass through AFD will introduce a new and unnecessary constraint on video content and screen location. To encourage the adoption of widescreen displays, content creators for both programming and advertising need the creative freedom to develop content for the widescreen format. Without AFD implementation and pass-through, a programmer could not be sure how a downstream MVPD might decide to format its widescreen programming for screens with a 4:3 aspect ratio. Programmers should not have to choose between optimizing content for a consumer who has invested in the equipment necessary to view widescreen 16:9 digital programming and a consumer who continues to expect to receive 4:3 programming.

Such formatting issues also are of concern for interstitial programming, such as public service announcements, news updates or advertising that, without AFD implementation, may be automatically formatted by a downstream MVPD in the same manner as the long-form program in which they appear. Because the sale of advertising time is essential to the viability of free-to-air television, broadcasters must be able to maintain the advertiser's intended presentation of commercial spots to all consumers during

a broadcast. AFD, if delivered to consumers for home downconversion and implemented by cable operators as part of headend downconversion, ensures that commercials are displayed exactly as the advertiser intended, which in turn protects the underlying economic basis for advertising-supported free-to-air television.

The adverse consequences of the loss of AFD to consumers, program producers and the overall success of the digital transition far outweigh any implementation costs of an AFD implementation/pass-through requirement on cable systems. The primary AFD burden falls on programmers and broadcasters, who must include AFD in their individual long-form or interstitial programming. In contrast, a cable system only has to install the appropriate equipment, which, in some cases, may be as minimal as a software upgrade, as part of the overall transition of a cable operator to digital.

Finally, an AFD implementation/pass-through requirement is consistent with the Commission's recognition of the value to consumers of AFD. In the most recent order on the transition to digital television, the Commission expressly "encourage[d] television manufacturers to implement the SMPTE standard and CEA-CEB16 into their TV sets, which will better allow broadcasters to take advantage of tools such as AFD to ensure that viewers receive a signal that is optimized for their TV set."[6] Such a clear Commission statement to television manufacturers in support of AFD loses all meaning if cable operators are not required to pass through AFD to these sets.

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[6] *Id.*

B. Proper MVPD Downconversion of Digital Audio Will Determine What Many Consumers Will Be Able to Hear Following the Digital Transition

The downconversion of audio, either by an MVPD or by a household receiving its local stations via an MVPD, also raises issues of concern to consumers. For example, one of the benefits of digital television for consumers is that digital programming may be broadcast in 5.1-channel digital surround sound, which includes six channels: a left channel, right channel, center channel, low frequency effects channel and left and right surround channels. However, many analog receivers use only two-channel stereo sound, which may cause some downconversion processes to relay only the left and right channels and drop the remainder, including the center channel that often is used for dialogue. Such incomplete downconversion of digital audio is not consistent with a consumer's reasonable expectations of what he or she should receive from a cable-delivered signal and in fact could receive from an over-the-air signal. Similarly, if cable operators are not required to use proper Dolby Digital/ATSC dynamic range profiles, consumers may receive a soundtrack with a ratio of soft to loud sounds that is not compatible with their home receiving equipment or that differs greatly from that intended by the programmer or that is available to consumers using over-the-air signals. Finally, digital broadcast content may include secondary audio programming ("SAP"), which often is used for second-language audio, but which may not survive improper downconversion.

The means to address each of these potential issues are readily available to MVPDs. With respect to the issue presented by two-channel stereo, Dolby Digital decoding hardware is automatically adjusted to the proper down-mixing variants by data inserted by the originating content provider and transmitted in the ATSC bit stream by a broadcaster. Cable operators thus should be expected to identify the proper two-channel stereo audio outputs

on the ATSC receiver/decoder and to apply these audio signals to the standard definition audio distribution system. With this configuration in place, ATSC digital soundtracks originating in both 5.1-channel surround sound or two-channel stereo will be formatted for analog distribution exactly as intended by the program provider.

With respect to dynamic range and volume issues, a variety of dynamic range digital steering information provided by the programmer is available in the Dolby Digital ATSC bit stream and selectable at the receiver/decoder. It is important for MVPDs to make appropriate use of audio metadata such as dialnorm for loudness control during the downconversion process from 5.1-channel surround sound to stereo. By choosing the proper profile matching the audio characteristics of the standard definition distribution system, the correct soft to loud ratio of the program and its loudness qualities will be maintained exactly as intended by the program provider. To ensure viewers the best experience possible, cable operators should be required to set their ATSC audio decoders to the proper "dynamic range" configuration based on the relevant sort of distribution system so that program audio will be compatible with a variety of consumer home-electronic systems.

With respect to SAP, a cable operator that is downconverting SAP-enabled programming should extract SAP data and transmit it as part of the analog signal so that consumers who currently rely on SAP may continue to do so. Although NBCU expects many MVPDs to deliver SAP voluntarily to consumers, the Commission should clarify that it expects SAP data on any broadcast channel transmitted by the cable operator to be protected as part of any downconversion process.

By clarifying to cable operators what is expected as part of the downconversion of digital programming, the Commission will ensure that viewers who may rely on such downconverted programming will not lose audio that they have come to expect or could receive through an over-the-air transmission. It also ensures basic uniformity for cable subscribers regardless of the identity of the operator or geographic location, which benefits consumers, broadcasters and MVPDs and smoothes the path to the nation's transition to digital.

C. Proper MVPD Downconversion and Retransmission of Other Established Data Will Protect Consumers and Broadcasters As Well as Facilitate the Digital Transition

In 2001, the Commission ruled that much data traditionally carried in the vertical blanking interval of a station's analog signal must be carried by retransmitting MVPDs.[7] As the Commission then concluded, the sorts of data that must be carried:

> include, but are not limited to, closed captioning information, program ratings data for use in conjunction with the V-chip functions of receivers, Source Identification Codes ("SID Codes") used by Nielsen Media Research in the preparation of program ratings, and the channel mapping and tuning protocols that are part of PSIP. [8]

As part of this proceeding's focus on the technical aspects of downconversion, the Commission should clarify or confirm that it expects MVPDs to preserve all data traditionally carried in the data portion of the analog signal in the vertical blanking interval – including all

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[7] *See Carriage of Digital Broadcast Signals,* First Report and Order and Further Notice of Proposed Rulemaking, 16 FCC Rcd 2598, 2624 (2001) ("*First Report and Order*"). In a 2005 reconsideration of parts of the *First Report and Order*, the Commission retained the named categories as program-related material that must be transmitted by cable systems, but noted that it would define these matters further in a future order. *See Amendments to Part 76 of the Commission's Rules*, Second Report and Order and First Order on Reconsideration, 20 FCC Rcd 4516, 4537 and n. 158 (2005). That future order has not yet issued.

[8] *First Report and Order*, 16 FCC Rcd 2624.

types of data noted in the *First Report and Order*, such as V-chip, Nielsen or closed captioning data – or in the ATSC Program System and Information Protocol ("PSIP") for inclusion in a downconverted signal.[9] For example, cable operators should pass through information such as national weather service codes used for weather alerts and other program identification, length and description data as the sorts of data that should be carried with respect to any local station programming transmitted by a cable operator to consumers, including downconverted programming.

II. THE COMMISSION HAS STATUTORY AUTHORITY TO ESTABLISH TECHNICAL MANDATES RELATING TO THE DOWNCONVERSION OF BROADCAST SIGNALS CARRIED BY A CABLE SYSTEM

The Commission has statutory authority to establish technical minimums for the appropriate downconversion (or retransmission for home downconversion) of local digital signals. Multiple provisions of the Communications Act of 1934, as amended, support the proposed requirement that cable operators pass through or appropriately downconvert important video, audio or other data within and related to any over-the-air broadcast programming retransmitted by a cable system. Consistent with such statutory authority, past Commission policy pronouncements also have included such technical mandates for appropriate MVPD retransmission of any broadcast signal.

Sections 614 and 615 of the Communications Act plainly require cable operators transmit local broadcast signals "without material degradation" to their subscribers.[10] In the *Third Report and Order* in this proceeding, the Commission re-affirmed that this obligation requires cable operators to transmit local broadcast signals without material degradation,

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[9] *See*, *e.g.*, 47 U.S.C. § 534(b)(3)(A); 47 U.S.C. § 535(g)(1).

[10] *See* 47 U.S.C. § 534(b)(4)(A); 47 U.S.C. § 535(g)(2).

except as necessary to allow SD or analog consumers to access the signals.[11] In the *Order*, the Commission agreed that a critical test of nondegradation is whether "the difference" between a station's signal as broadcast or as transmitted by a cable operator "is not really perceptible to the viewer."[12] The *Order* confirms that a similar obligation applies to viewers who may only be able to access a downconverted digital signal following the mandated transition of full-power broadcast stations to digital, although cable operators are permitted to downconvert the signal in a manner accessible to these viewers.[13] Such downconversion, if not handled with particular attention to a consumer's needs, could adversely affect the consumer's overall experience with digital. For example, failure to retransmit AFD to consumers could cause significant differences in the video accessible to cable subscribers as compared to over-the-air viewers with home downconversion equipment; similarly, improper reformatting of digital audio could cause loss of audio for cable subscribers, but not over-the-air viewers.[14]

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[11] *See Order* at ¶¶ 7, 18.

[12] *Id.*

[13] *Id.* at ¶ 13.

[14] Under established Commission policy, the material nondegradation obligation has applied to all local television programming carried by a cable system, regardless of the legal basis for such carriage. *See Implementation of the Cable Television Consumer Protection and Competition Act of 1992*, Report and Order, 8 FCC Rcd 2964, 3004 (1993). Some commenters have asked whether that policy should continue with respect to digital broadcast signals post-digital transition, and the Commission has requested comment. *See Notice* at ¶ 78. With respect to any local station programming that a cable system has chosen or is required to carry (whether in HD or downconverted form), the public would be better served by the unimpeded transmission of any data that affects what any consumer can see or hear, including AFD, as well as other important and established programming data, such as closed captioning or Nielsen or v-chip ratings information.

Section 614(b)(4)(B) likewise authorizes the Commission to adjust terms of carriage for advanced (i.e., digital) television in order "to establish any changes in the signal carriage requirements of cable television systems necessary" for appropriate carriage of local stations.[15] The Commission repeatedly and correctly has cited this provision in updating technical matters relating to the carriage of local television digital broadcast signals, such as carriage of technical data that, in the analog environment, had been transmitted on the vertical blanking interval.[16]

Independent of each of these statutory provisions, the Commission has established its authority with respect to the cable carriage of technical data relating to television programming in other past decisions. For example, the Commission previously has required similar technical obligations with respect to cable systems carrying local analog broadcast signals.[17] Accordingly, the Commission has sufficient authority to promulgate the proposed technical minimums as part of its jurisdiction over digital carriage and downconversion.

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[15] *See* 47 U.S.C. § 534(b)(4)(B).

[16] *See, e.g.*, *First Report and Order*, 16 FCC Rcd at 2624.

[17] *See, e.g.*, *Amendments to Part 76 of the Commission's Rules*, Second Report and Order and First Order on Reconsideration, 20 FCC Rcd 4516, 4537 and n. 158. (2005); *Implementation of the Cable Television Consumer Protection and Competition Act of 1992 Broadcast Signal Carriage Issues*, Order on Reconsideration, 9 FCC Rcd 6723, 6734 (including Nielsen-related data in definition of program-related material for purposes of MVPD carriage).

CONCLUSION

For the foregoing reasons, NBCU asks that the Commission adopt or confirm the proposed clarifications of the baseline technical requirements of any local television programming retransmitted or downconverted by a cable system.

Respectfully submitted,

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