

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

In the Matter of)	
)	
Amendment of Parts 73 and 74 of the)	MB Docket No. 08-253
Commission's Rules to Establish Rules for)	
Replacement Digital Low Power Television)	
Translator Stations)	

COMMENTS OF THE CONSUMER ELECTRONICS ASSOCIATION

The Consumer Electronics Association¹ (“CEA”) submits these Comments on the Notice of Proposed Rulemaking² (“NPRM”) adopted by the Commission in the above-referenced docket. CEA strongly supports the proposals in the NPRM generally, but asks that the Commission reverse its tentative conclusion that new stations in the replacement digital television translator service be given a unique call sign.³ Instead, the Commission should assign these new translator stations the same call sign as the full-service station that the translator retransmits.

Allowing translators to use the full-service station call sign would preserve important functionality in the American Television Standards Committee (“ATSC”) digital television transmission standard, thereby enhancing the user experience of digital television viewers that receive both the translator and full-power station signals, and eliminating the need for unnecessary and duplicative equipment purchases by broadcasters. Further, allowing a replacement digital TV translator to share the call sign of its full-service counterpart would comport with the Commission’s traditional treatment of fill-in broadcast television transmitters.

¹ CEA is the principal U.S. trade association of the consumer electronics and information technologies industries. CEA’s more than 2,200 member companies include the world’s leading manufacturers. CEA’s members design, manufacture, distribute and sell a wide range of consumer products including television receivers and monitors, computers, computer television tuner cards, digital video recorders, game devices, navigation devices, music players, telephones, radios, and products that combine a variety of these features and pair them with services – all as chosen by consumers in an open marketplace.

² Amendment of Parts 73 and 74 of the Commission’s Rules to Establish Rules for Replacement Digital Low Power Television Translator Stations, *Notice of Proposed Rulemaking*, FCC 08-278 (rel. Dec. 23, 2008).

³ NPRM at para. 10.

Discussion

Requiring transmitters in the new proposed replacement digital television translator service to take different call signs from their primary stations would defeat useful functionality built into the ATSC Program and System Information protocol (PSIP) standard for digital television.⁴ The ATSC standard accommodates broadcasters that wish to replicate the digital bit stream of the full-power service (bit for bit, with identical programming, over the entire broadcast day) on a different RF frequency. The standard includes this functionality to address precisely the situation identified by the Commission in this proceeding: enabling full-service stations to continue to provide service to viewers who have lost service as a result of the transition to digital.

If, as proposed, a translator must take a different call-sign than its full-service counterpart, the translator would need to replace the elements of the Program and System Information Protocol (PSIP) in the digital bit stream it receives from the full-service station with alternative values specific to the translator. Two problems would result. First, in many instances, a consumer's receiver may receive both the main-station signal, and the retransmitted signal from a translator. Anticipating this situation, CEA Recommended Practice on receiver response to PSIP, CEA-CEB12-A, indicates that when a TV receiver "sees" duplicate transmissions on different frequencies, it should recognize the duplication, and create a channel lineup that shows the user one channel rather than two.⁵ This functionality exists to minimize consumer confusion, but it requires transmission of identical PSIP data, not just identical video data, for optimal receiver functionality.

Second, requiring separate translator call-signs would impose unnecessary cost and complexity on translator operators. Under the proposal in the NPRM, operators would be forced to purchase additional equipment and devote personnel resources, in order to: 1) capture and

⁴ ATSC A/65C, "ATSC Program and System Information Protocol for Terrestrial Broadcast and Cable," (Revision C) (2006).

⁵ See CEA-CEB12-A, Sec. 5.2 (2003). CEA believes that most digital television receivers manufactured since 2003 follow this recommended practice.

decode the main-station digital bit stream; 2) replace certain PSIP values in that bit stream with values for the translator; and 3) reassemble the bit stream for transmission by the translator facilities. This cost and effort seems unreasonable, given that the Commission has tentatively concluded that replacement translators shall be licensed only to boost or fill in loss areas within the main station's analog service area,⁶ rather than to extend or expand the station's footprint.

Indeed, the functionality proposed in the NPRM for this replacement translator service reinforces the proposition that such translators should maintain the same call sign as their corresponding full-service counterparts. Throughout the NPRM, the Commission makes clear that the intent of this new service is to restore coverage to areas within full-power station's coverage area that have lost service due to transition of that station from analog to digital transmission.⁷ By contrast, it is not the purpose of the proposed new service to expand the digital coverage of the full-service station beyond its previous, analog boundary. In this sense, the proposed new translator service seems more analogous to a traditional TV broadcast booster station, which must be "located such that its entire service area is located within the protected contour of the primary station it retransmits."⁸ By contrast, a traditional TV broadcast translator station faces no such restriction.⁹

This definitional distinction is relevant to the issue of whether a station in the proposed new replacement translator service should be permitted to take the call sign of its affiliated full-service station. A traditional TV booster station does not receive a unique call sign, and in fact is identified by broadcasting of their primary station's call sign and location.¹⁰ By contrast, a traditional TV booster station must take a unique call sign and must be separately identified by its

⁶ NPRM at para. 7 ("We tentatively conclude that the service area of the replacement translator should be limited to only a demonstrated loss area . . ."); see also NPRM at para. 5.

⁷ See, e.g., NPRM at para. 1.

⁸ 47 C.F.R. 74.701(i).

⁹ See 47 C.F.R. 74.701(a).

¹⁰ See 47 C.F.R. 74.783(f).

primary station.¹¹ Given that the proposed new service seems more like a traditional booster than a traditional translator, it is reasonable that the call-sign requirement for the new service should follow existing rules for boosters, thus allowing duplication for of the primary station.

Conclusion

CEA supports the proposed replacement digital television translator service and expects it will facilitate the transition from analog to digital broadcasting for many Americans. As explained above, however, CEA requests that the Commission reconsider one small but significant detail of its proposal, and allow stations in this new service to take the call signs of the full service counterparts that they retransmit. This change from the Commission's original proposal would benefit both consumers and broadcasters, and would follow the Commission's past practice and treatment of similar TV services.

Respectfully submitted,

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¹¹ See 47 C.F.R. 74.783(b), (d).