OPEN MOBILE VIDEO COALITION

September 30, 2009

VIA ELECTRONIC FILING

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Notice of Inquiry: Fostering Innovation and Investment in the Wireless Communications Market (GN Docket Nos. 09-157 and 09-51)

Dear Chairman Genachowski and Commissioners Copps, McDowell, Baker and Clyburn:

In this proceeding, the Commission has asked about innovation and investment in the wireless communications marketplace and about spectrum utilization more generally. The Open Mobile Video Coalition (OMVC) supports the Commission's view that the National Broadband Plan should be consumer-oriented. It believes that broadcasters can help think through the nationwide wireless broadband plan and can help achieve its goals through use of their existing infrastructure.

Having made the $10 billion investment in the digital transition (made possible by a special public-private partnership) that culminated in the June 12 cut-over to digital from analog, many in the television station community and related industries have sought to tap the potential of digital technology to support innovative services to the public. Toward this end, OMVC was formed as an alliance of over 800 commercial and public television stations to advance the development of mobile digital television in small, medium, and large communities, nationwide. Attachment A lists OMVC's members.

Over the past two years, OMVC has worked intensively with the Advanced Television Standards Committee (which developed the standards that made digital television service possible) to fashion, test, evaluate and obtain approval of the 850-page technical standard for mobile DTV. Final approval is expected on October 15.

OMVC, in conjunction with seven Washington/Baltimore area television stations, also is establishing a Mobile DTV Consumer Showcase beginning this fall. We would welcome each of you, your staffs and others at the FCC to visit the Showcase, so that we may demonstrate the technology, show you sample devices, and explain some of the applications and their benefits to the public. Anne Schelle, OMVC's executive director, will be in contact with your offices to arrange for you to visit the Showcase.

In addition, OMVC is currently working with broadcasters in Seattle and Atlanta on model station projects in those cities to test and perfect the myriad technical features of mobile DTV implementation. Further, 70 television stations intend to launch mobile DTV services this fall and winter, of which seven are already on the air.

OMVC here submits a summary of the efforts by broadcasters and sister technology industries to launch innovative mobile DTV services in the United States that will be provided within each broadcaster's existing 6 MHz of digital spectrum. See Attachment B.

Mobile DTV will:

- serve the interests of the public,
- enlarge and make more effective broadcasting's special public safety role,
- facilitate and promote new programming services,
- create jobs,
- stimulate the economy, and
- more intensively and productively use broadcasters' pared-back, post-transition digital spectrum resource.

To say a little more about mobile DTV's contribution to the goal of improved public safety services, broadcasting is the only reliable wireless communications system to deliver critical news and public safety information during times of emergency, like fires, hurricanes, and floods. In contrast, cellular and other wireless networks are ill-equipped to transmit information to the public in times of emergency or high usage. Even in ideal conditions, these systems often struggle to provide consumers with uninterrupted streaming video and audio.

While OMVC takes no position on many of the issues about which the Notice of Inquiry asks for comment, it would be happy to provide more information about mobile DTV. I hope I will have a chance personally to discuss with you the new opportunities it will provide.

Respectfully,

Brandon Burgess
President
Open Mobile Video Coalition

cc: Anne Schelle
Jon Blake

ATTACHMENT A

OMVC Members

Association of Public Television Stations

Belo Corporation


Capitol Broadcasting Company

Cox Television

CPB

Dispatch Broadcast Group

Fisher Communications

FOX Television Stations

Freedom Broadcasting, Inc.

Gannett Broadcasting

Gray Television Inc.

Hearst Argyle Television, Inc.

ION Media Networks, Inc.


LIN TV Corp.

Media General Inc.

Meredith Broadcasting

MHz Networks

Morgan Murphy Media

NBC Universal – NBC Station Group and Telemundo

PBS

Peachtree TV

Post-Newsweek Stations

Raycom Media

Schurz Communications, Inc.

Scripps Television Station Group

Sinclair Broadcast Group Inc.

Sunbeam Television Corp.

McGraw-Hill Broadcasting

News, Press and Gazette Company

Associate Members

Association for Maximum Service Television

National Association of Broadcasters

ATTACHMENT B

THE DEVELOPMENT OF MOBILE DTV

This paper summarizes broadcasters' efforts to date to launch mobile DTV in this country using their existing digital spectrum resource and various technological breakthroughs, their future roll-out plans, and the services and benefits that mobile DTV will facilitate.

HOW MOBILE DTV WORKS

The mobile DTV system allows local broadcasters to deliver crisp and robust video programming and data to a variety of mobile and portable devices. Within the ATSC system, mobile DTV works in broadcasters' existing 6 MHz channel, but uses this spectrum more intensively and productively so that mobile DTV causes no degradation of the primary television programming signal. The system also uses broadcasters' existing towers and transmission infrastructure.

Consumers will be able to receive mobile DTV signals through a wide variety of mobile and portable devices, including Mobile Internet Devices, mobile phones, laptops, netbooks, portable media players, game players, smart phones, portable navigation devices, and in-car entertainment systems. These devices receive the mobile DTV signal through integrated mobile DTV chipsets or USB dongles that attach to the mobile devices that consumers already own.

THE ATSC STANDARD-SETTING PROCESS

For over two years, the OMVC has been working with the Advanced Television Systems Committee (ATSC) — the international organization that worked out the technical standards for digital television — to develop a separate technical standard for mobile DTV. The standards-setting process for mobile DTV began in the spring of 2007 when ATSC developed detailed

system requirements. Since then, numerous subcommittees have been created to address, for example, reception, file delivery, interoperability, content protection, and compression.

The mobile DTV technical standard has met several milestones. In the first quarter of 2008, Independent Demonstration of Viability field tests were conducted by OMVC, in close coordination with ATSC, in the San Francisco and Las Vegas areas. Those tests produced nearly 150 hours and 1000 miles of mobile data. Later that year, the ATSC elevated its specifications for mobile DTV to Candidate Standard status, allowing broadcasters and other industries to develop transmission systems and devices to provide new services to mobile and portable devices using broadcasters' digital television transmissions. The technical standard, which is about 850 pages long, is expected to gain final ATSC approval by October 15, 2009, just over two years from when the initial process began.

THE INDUSTRIES INVOLVED

The speed at which the 850-page mobile DTV standard has been drafted is a testament to an unprecedented, multi-industry effort. Broadcasters, mobile device manufacturers, and equipment manufacturers have coordinated closely to ensure that mobile devices and transmission equipment meet the technical standard for mobile DTV. Companies from around the world, including 17 OMVC members and hundreds of engineers, have participated in the process.

MOBILE DTV ROLL-OUT EFFORTS -- PAST AND FUTURE

Broadcasters across the country have volunteered to help test and perfect the technology. Dozens of test systems have been operating in cities including Chicago, New York, and Denver. In June, Capital Broadcasting's WRAL successfully launched its mobile DTV service by

delivering its signal to screens placed in Raleigh's public buses. In July, Gray Television's WOWT-TV began broadcasting its mobile DTV signals in Omaha, Nebraska. Working with the Consumer Electronics Association's Special Interest Group on Mobile DTV, model stations in Atlanta (Gannett's WATL-DT and Media Networks' WPXA-DT) and Seattle (Belo's KONG-DT and Fisher's KOMO-DT) will be conducting interoperability tests for receivers and transmitters in early December. These tests will help accelerate development cycles for receiving devices because the model stations will allow mobile device and transmission equipment manufacturers to test under real-life conditions pre-commercial consumer devices and transmission equipment that have been developed to the final ATSC standard.

In addition, seven stations are participating in a mobile DTV consumer showcase in the Washington, D.C. market. As part of this test, consumers are able to view mobile DTV content and test new services and features. Participating stations include: Fox Television Stations' WDCA-DT, Gannett Broadcasting's WUSA-TV, ION Media Networks' WPXW-DT, MHz Networks' WNVT-DT, NBC Universal's WRC-DT, PBS's WHUT-DT, and Sinclair Broadcast Group's WNUV-DT.

PROJECTIONS OF THE SCOPE AND MAGNITUDE OF MOBILE DTV SERVICES

Approximately 70 stations in 28 markets are expected to be transmitting mobile DTV services by the end of the year, with many more to follow. The early launch stations will include PBS member stations and commercial stations affiliated with the ABC, CBS, NBC, FOX, CW, MyNetwork TV, and ION Television networks. Although there are many complexities involved in rolling out a new service, with one being the standard-setting process that already is nearly complete, mobile DTV has the strength of using broadcasters' existing spectrum and

infrastructure, which can be supplemented at very little cost in order to provide nationwide service.

Mobile DTV's promise was recently recognized in a SNL Kagan article, which reported that "[d]espite the early stages, carriers and content owners are already boldly experimenting with mobile TV, and the many reasons to utilize handset-based live mobile TV point to a much brighter future for the new format compared to the single-purpose portable TVs of yesteryear."[1] Moreover, while it is particularly difficult to make reliable predictions in this economic environment, a BIA Financial Network report found that broadcasters are expected to realize $2 billion in advertising revenue for mobile DTV by 2012, and that approximately 130 million phones and 25 million media players will receive mobile DTV signals by 2012.[2]

South Korea, Japan, and China already have rolled out mobile television service to the public. South Korea began offering satellite and terrestrial mobile television in 2005, and Japan quickly followed. China expects to have 50 million users of broadcast digital mobile television in 2010, only one year after the introduction of service.

PUBLIC INTEREST BENEFITS

Mobile DTV allows broadcasters to serve their local communities with more content, more of the time, and in more locations. As mobile DTV continues to grow, broadcasters and device manufacturers inevitably will develop innovative uses for mobile DTV that will benefit

[1] John Fletcher, "The Future of Live Mobile Television," SNL Kagan (Sept. 29, 2008).

[2] Todd Spangler, "Broadcasters Wrap Up Mobile-Tech Trials," *Multichannel News* (Apr. 21, 2008).

the public. For example, the widespread launch of mobile DTV services will provide opportunities for:

Greater Access To Public Safety Alerts. Mobile DTV is ideal for alerting public safety response teams and the public of local emergencies, such as earthquakes, hurricanes, fires, or other disasters. Broadcasting is the only reliable, one-to-many wireless communications system to deliver critical news and public safety information during times of emergency; digital television signals travel long distances, are robust, and do not require a large antenna. Mobile DTV will improve broadcasters' ability to reach the public because public safety alerts will be accessible from almost anywhere on many different devices, even while the person is traveling at fast speeds or during power outages.

Increased Programming Diversity and Enhanced Services. In addition to the programming available on the station's primary video stream, broadcasters can add to the diversity of their offerings by including mobile DTV channels that include new locally-produced, niche, and foreign language programming, real-time weather and traffic reports, breaking news, live sports information, information about local events, and stock market news. Mobile DTV also allows broadcasters to offer new interactive and location-based services, including time-shifting and video-on-demand features.

Reduced Broadband and Wireless Network Congestion. Mobile DTV offers an efficient one-to-many means of simultaneously delivering high-quality video programming to the public at almost no incremental cost to the station. In contrast, other video distribution technologies that rely on one-to-one communications have limited capacity for bandwidth-intensive video content, resulting in either poor quality video or network congestion. For example, due to real-time capacity constraints, consumers complained of degraded service when

trying to stream FIFA 2006 World Cup games and highlights using cellular network services.[3] By offering an alternative platform for distributing video programming to portable devices, mobile DTV will help relieve the network congestion that broadband and wireless operators are experiencing, while at the same time maintaining or improving video quality.

Job Creation. Widespread launch of mobile DTV will create demand for new jobs in a variety of areas. From the production of diverse programming for the mobile DTV schedule, to the crews that make possible the transmission of such programming, to the equipment manufacturers that make the mobile devices and transmission equipment, skilled workers will be needed for the mobile DTV system to function.

Open Mobile Video Coalition

[3] John Fletcher, "The Future of Live Mobile Television," SNL Kagan (Sept. 29, 2008).