

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

In the Matter of)	
)	
International Comparison and Consumer)	GN Docket No. 09-47
Survey Requirements in the Broadband)	
Data Improvement Act)	
)	
A National Broadband Plan for Our Future)	GN Docket No. 09-51
)	
Inquiry Concerning the Deployment of)	GN Docket No. 09-137
Advanced Telecommunications Capability)	
To All Americans in a Reasonable and)	
Timely Fashion, and Possible Steps to)	
Accelerate Such Deployment Pursuant to)	
Section 706 of the Telecommunications)	
Act of 1996, as Amended by the Broadband)	
Data Improvement Act)	

To: Secretary, Federal Communications Commission
Attention: The Commission

**COMMENTS OF WITF, INC.
IN RESPONSE TO NBP PUBLIC NOTICE # 26**

WITF, Inc. provides these comments in response to the Commission’s Public Notice¹ seeking comment in the referenced dockets on spectrum for broadband.

We are the licensee of noncommercial educational television station WITF-TV, DTV Channel 36 (Major Channel 33), Harrisburg, Pennsylvania. WITF is a trusted, valued supplier of programs and services that both satisfy and stimulate curiosity for residents in every community in the central Pennsylvania region. WITF’s broadcast services reach audiences in over 17 counties in central Pennsylvania. Our mission is to

¹ *Data Sought on Uses of Spectrum - NBP Public Notice #26*, GN Docket Nos. 09-47, 09-51, 09-137, Public Notice, DA 09-2518 (rel. December 2, 2009) (the “Public Notice”).

create a shared civic and cultural life for the communities of our region, connecting us to each other and to opportunities for lifelong learning.

In the Public Notice, with a mind toward finding additional spectrum to allocate for wireless broadband purposes, the Commission seeks specific data on the use of spectrum currently licensed to broadcast television stations. Among other things, the FCC is attempting to account for the value that the country puts on free, over-the-air television. As reflected in the information we provide below, we urge the Commission to find that our current and planned use of our licensed television broadcast channel is efficient and productive, and brings great value to our community. The cost to us and to our community resulting from the loss or curtailment of our over-the-air transmission service would be enormous and unacceptable.

Comments

WITF provides extremely valuable children's programming and other noncommercial educational TV offerings to its local community, including tens of thousand of households that rely on over-the-air service, and over 1 million more whose cable or alternative distribution providers pick up WITF's off-air signal. WITF is now considering various options for SD channel programming, including an innovative local channel, but those plans cannot survive any changes that decrease the broadcast spectrum currently available to the station. In addition, as noted below, WITF must continue to address the extraordinary costs related to the completion of its recent DTV conversion. Not only would many of those costs be rendered useless if WITF were to lose over-the-air service, but WITF would also face several new expenses and technical issues in order to continue to provide its public TV programming for local viewers.

WITF's DTV programming stream consists of mission-driven content for children and adults. Each week, about 369,000 viewers – nearly a third of all television viewers in the market – tune to WITF. We also devote a minimum of 2,715 hours of programming per year for children. Approximately 70% of WITF's programs come from PBS's National Program Service, including titles such as *Nature*, *American Experience*, *Masterpiece*, *Nova*, *Frontline* and *Sesame Street*. Other content includes popular British comedies, performance specials, documentaries and "How-To" shows. The PBS programming seen on WITF has been praised as a "trusted national institution," one of the "best uses of tax dollars," and "the top video choice of teachers," and has been ranked as the highest quality programming by parents for kids ages 2-11.

Original WITF programming includes the weekly public affairs talk show *Smart Talk*, which offered viewers 33 programs in 2009, featuring guests such as Senator Arlen Specter and former First Lady of Pennsylvania Michele Ridge; WITF's travel series, *Explore PA*; WITF's *HealthSmart*, which provided viewers with valued information on diabetes, stroke awareness, Alzheimer's disease, cancer, heart disease, and mental health in 2009; *Issues PA*; and documentaries. Notably, WITF is the sole provider of public broadcasting content to the significant majority of our viewers.

Importantly, WITF is currently considering plans for adding new noncommercial educational programming streams – plans which would need to be scrapped as a result of any loss of broadcast spectrum. One consideration is the proposed **WITF Local** channel, which would provide central Pennsylvania with an array of locally-produced programming. Initially, **WITF Local** would draw upon our vault full of approximately 40 years of locally produced cultural, educational, and instructional programming.

Additionally, **WITF Local** could be an outlet for local sporting and cultural events. New programs would originate from WITF or local production companies and content could also be solicited from other Pennsylvania public television stations to provide a greater range of programming choices to our audience. After **WITF Local's** launch year, a new phase of programming would include coverage of cultural events and area concerts, as well as high school and college area sports events.

WITF is also considering other additional programming sources, such as the **PBS World** channel, which consists of historical documentaries, episodes of *Nova* and the *American Experience*, international documentaries and other similar programming, and the **Create** programming stream, which features materials distributed through American Public Television and WBGH and consists primarily of popular “*How-To*” shows.

WITF's current HD stream data rate allocation is 14-17 MB. Implementation of the plans noted above for additional SD channels would require lowering the HD resolution or obtaining and installing new encoding equipment. Given its current encoding equipment, WITF has very little capacity to “share” with other broadcasters. If compelled to do so, such an arrangement would preclude WITF from ever initiating any of additional SD channels discussed above, as well as requiring WITF to implement new encoding equipment or a lower HD resolution.

WITF reaches tens of thousands of TV households via its over-the-air service, and over 1 million more viewers through cable systems that pick up WITF's over-the-air signal. We currently reach 56,580 households with our over the air signal only, such that those families would be forced to buy service from other means if our over-the-air signal was unavailable. In addition, there are at least eleven headends for cable, telco operators

and satellite systems that receive WITF over-the-air. An estimated 1.2 million subscribers are served by those systems which rely on WITF's over-the-air signal.

In the event that the loss over-the-air service affected those headend signal deliveries, WITF would be forced to address a number of financial and logistical complications for restoring service. For instance, microwave delivery is not feasible for some of the far-reaching headend locations. In addition, HD satellite service would be an expensive proposition on an on-going basis, and WITF would need to add HD encoding equipment at its own end for delivery. Moreover, fiber delivery would also require vast expenditures because several copies of the signal would have to be sent (for DISH Network, DIRECTV, FIOS, and smaller cable companies). Those services aside, WITF would also need to make significant arrangements to account for signal delivery to its TV translator stations (and viewers).

Any such costs would be all the more difficult for a non-profit, noncommercial entity such as WITF to address in the wake of the costly DTV transition. To date, WITF has invested more than \$3.6 million in its DTV facilities and conversion. Approximately 50% of that investment came directly from public contributions. If our over-the-air signal were to end, approximately \$929,000 in expenditures – nearly \$1 million – would be rendered useless, including \$250,000 in studio-to-transmitter link costs, \$250,000 in transmitter equipment costs, \$100,000 in antenna costs, \$150,000 in terminal gear and remote control costs, and \$179,000 in excess air conditioning and emergency generator capacity costs. WITF also faces approximately \$725,000 in continuing financial commitments related to its over-the-air broadcast facilities and operations that need to be met regardless of whether its still operating over the air transmission facilities.

Conclusion

Based on the foregoing reasons, we urge the Commission to find that our use of our television broadcast channel efficient and productive, and abundantly serves the public interest. Our over-the-air transmission capabilities must be protected in any effort that the Commission might undertake to allocate more spectrum for wireless broadband systems.

Respectfully submitted,

WITF, INC.

By: /s/ Kathleen A. Pavelko
Kathleen A. Pavelko
President & CEO

WITF, Inc.
4801 Lindle Road
Harrisburg, PA 17111
(717) 704-3000

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Of counsel:
Todd D. Gray
Barry S. Persh
Dow Lohnes PLLC
1200 New Hampshire Ave. NW
Suite 800
Washington, DC 20036
tgray@dowlohn.com