Received & Inspected
APR 2 0 2010
FCC Mail Room

Dennis Park Smith
3605 San Remo Drive
Santa Barbara, California 93105-2523
Monday, April 19, 2010

Commission's Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, Southwest
Washington, DC 20554

Refer to: GN Docket Nos. 09-47. 09-51. and 09-137
Re: Comments – NBP Public Notice # 26

Mr./Ms. Secretary:

I have some comments and opinions regarding the FCC proposal to eliminate channels 45 to 51 from television broadcasting. Some of these comments may seem like demands, but of course they really are not. They are my opinions. My feelings on this are strong, to the extent that I might seem brusque or angry and not particularly diplomatic in these statements.

Yes, there is growing use and interest in radio-frequency spectrum space. Yes, that is a problem because there appears to be only so much space available.

At the present time, with the current regulations and with the present state of technology of digital television, television broadcast from channel 14 and up are performing the best, compared to channels 2 through 13. While the state of technology is still quite young, much of it is due to limitations of radiated power of channels 2 through 13. Let's look at all of the television-broadcast channels in groups.

Channels 2 through 6. This is the worst-performing group. There are possibly technical or transmitting or receiving or propagation peculiarities, but I wonder if the main reason is radiated-power restriction at too low a level to be practical, so there are very few digital TV stations transmitting on this group of channels. If channels 45 to 51 are being considered to be done away with, why are channels 2 to 6 not being considered? If the FCC is determined to get rid of the well-performing channels 45 to 51. the FCC ought to figure out how to get channels 2 to 6 out of the doldrums that they are in.

Channels 7 through 13. This group seems to be performing fairly well, but it could be better. The answer here would seem to be at least a somewhat higher level of allowable radiated power.

No. of Copies rec'd 0
List ABCDE

Channels 14 to about 20. This group has been hampered since the 1960s with shared two-way radio services. The radio services were instituted when it was thought that UHF television was not doing very well and that the spectrum could be more efficiently used by allowing other types of users to co-inhabit the television space. That was a mistake, as UHF television has continued to develop over the years. As a result, I have observed in my region that channels 14 through 17 are under-used, especially now by today's digital TV broadcasters. There is a fear of interference from radio services within these channels as well as fear that radio services just below channel 14 might interfere. However, there is no interference from below channel 14, because digital TV transmissions on adjacent channels do not interfere with each other. Whatever radio services are operating within channels 14 to 20 ought to be put below channel 14.

Channels approximately 20 through 51. These are doing well, with of course the exception of channel 37, which is not allowed for television as it is reserved for radio astronomy, so it is out of the picture for television broadcast.

Moreover, there is quite an amount of spectrum space reserved for government use, perhaps more than is actually being used. Yes, there are security concerns to be considered in that regard. However, it would be more efficient if some of that space were to be transferred to the demands of those who see only television-broadcast space as the target for their use.

Overall, television broadcast has already been cut back more than enough, and there are too many things as I have noted that are still problems with these existing TV channels. The channels still in use need more efficient and equal use and encouragement, all the way from channel 2 through channel 51.

I cannot help but wonder if the television channels are to be whittled down over time until there are none remaining. There is the feeling among some that cable television is good enough, and that all television broadcasting should be taken off the air and put on cable, or satellite, or some type of service that one would have to pay for. That is not what broadcasting in the United States has been, nor should it be.

Thank you for any consideration of these comments and opinions.

Sincerely,

Dennis Park Smith

Dennis Park Smith