

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

In the Matter of )  
 )  
Amendment of Parts 73 and 74 of the )  
Commission's Rules to Establish Rules )  
For Digital Low Power Television, )  
Television Translator, and Television )  
Booster Stations and to Amend Rules )  
For Digital Class A Television Stations )  
 )

MB Docket No. 03-185

To: The Commission

**COMMENTS OF HARRIS CORPORATION**

December 17, 2010

## TABLE OF CONTENTS

I.	HARRIS IS COMMITTED TO FACILITATING ALL BROADCASTERS CONVERSION TO DIGITAL BROADCASTING IN ORDER TO PROVIDE VIEWERS WITH NEW INNOVATIVE SERVICES .....	2
II.	TO COMPLETE THE TRANSITION OF ALL TELEVISION STATIONS TO DIGITAL BROADCASTING THE COMMISSION SHOULD ESTABLISH A HARD TRANSITION DATE FOR CONVERTING LOW POWER TELEVISION STATIONS TO DIGITAL OPERATIONS.....	3
III.	THE COMMISSION SHOULD WAIT TO TAKE ANY ACTION THAT WOULD REPACK OR REALLOCATE CURRENT BROADCASTING SPECTRUM UNTIL ALL TELEVISION SERVICES ARE CONVERTED TO DIGITAL OPERATIONS.....	6
IV.	DIGITAL BROADCASTING TRANSMISSION EQUIPMENT IS READILY AVAILABLE AND MANUFACTURERS ARE PREPARED TO WORK WITH LOW POWER TELEVISION STATIONS ON THEIR DIGITAL TRANSITION. ....	7
V.	HARRIS PROVIDES COMMENT ON A NUMBER OF ADDITIONAL TECHNICAL AND PROCEDURAL QUESTIONS POSED BY THE COMMISSION'S <i>FURTHER NOTICE OF PROPOSED RULEMAKING</i> .....	9
	1. Harris Endorses the Proposed Commission Filing Freeze on Certain Analog and Digital LPTV Applications.....	9
	2. Holders of Active Digital Construction Permits Should Not Be Required to Surrender Their Permit Because of the Expiration of an Associated Analog Construction Permit That Was Not Utilized.....	9
	3. Class A Stations Should Be Extended Primary, Protected Status for their Digital Allocation After Ceasing Analog Operations.....	10

4. Harris Endorses the Commission’s Proposal to Expand the “30 Mile Rule” to Determine What is Considered a Low Power Television Minor Application Change.....	10
5. The Commission Should Obtain Actual Vertical Radiation Patterns for All Low Power Television Stations to Maximize Use of Broadcasters Spectrum.....	11
6. The Commission Should Maintain Full Power Emission Masks for Low-Power Television Stations to Prevent Interference.....	12
VI. CONCLUSION.....	12

## EXECUTIVE SUMMARY

The benefits that will be provided to the low power television (“LPTV”) community through the transition to digital broadcasting will be immense. Digital television (“DTV”) will afford LPTV broadcasters the opportunity to offer viewers new services with added public interest benefits and become more competitive in the media marketplace. Harris believes the time is ripe for LPTV stations to complete the process of transitioning to digital broadcasting. There is a readily available supply of modestly priced broadcast equipment that would enable LPTV stations to complete their DTV transition over the course of the next two to three years without detrimentally impacting LPTV broadcasters’ services or viewers. In fact, many LPTV stations have already voluntarily started the process of making their DTV transition. In addition, there is currently grant funding available through the National Telecommunication and Information Administration’s LPTV and Translator Upgrade Grant Program to reimburse LPTV stations for certain upgrade costs. However, since only LPTV stations in “rural communities” are eligible to receive grant funding from the LPTV Grant Program, Harris recommends that the Commission submit a request to Congress to expand the eligibility of the program to include all LPTV stations.

To provide LPTV broadcasters with a reasonable amount of time to complete their DTV transition, the Commission should work quickly to conclude the current proceeding and establish a hard transition deadline. Harris believes that an out of core low-power digital television (“LPDTV”) transition date of December 31, 2011 and a complete LPDTV transition date of December 31, 2012, would be reasonable. However, Harris would also support a final LPDTV transition date in 2013 if the Commission determines, based on the input of the LPTV community, that such a transition date is more appropriate.

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To: The Commission

**Comments of Harris Corporation**

Harris Corporation (“Harris”) respectfully submits these comments in response to the Federal Communications Commission’s (“Commission”) *Further Notice of Proposed Rulemaking*<sup>1</sup> (“*FNPRM*”) to consider issues that need to be resolved to complete the low power television digital television transition (hereinafter “*LPDTV transition*”). Harris commends the Commission on issuing this *FNPRM*. The benefits that will be provided to the low power television (“*LPTV*”) community through the transition to digital broadcasting will be immense. Transitioning to digital broadcasting will provide *LPTV* stations with many of the same business opportunities that have been afforded to full power television stations following the completion of their digital television (“*DTV*”) transition 18 months ago. Harris encourages the Commission to complete the transition of all television broadcasting services to digital operations before

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<sup>1</sup> Amendment of Parts 73 and 74 of the Commission’s Rules to Establish rules for Digital Low Power Television, Television Translator and Television Booster Stations and to Amend Rules for Digital Class A Stations, MB Docket No. 03-185, *Further Notice of Proposed Rulemaking and Memorandum Opinion and Order*, 25 FCC Rcd. 13833 (rel. Sept. 17, 2010) (“*LPDTV Transition FNPRM*”).

taking on any efforts to reallocate or repack television broadcasters existing spectrum allocation, as proposed in the National Broadband Plan.

Broadcasters' ability to serve one-to-many is unique across all communications services and the hyper local benefits provided by both full-power and LPTV broadcasters cannot be overlooked. There is a readily available supply of modestly priced broadcast equipment that would enable LPTV stations to complete their DTV transition over the course of the next two to three years without detrimentally impacting LPTV broadcasters' services or viewers. Harris believes that an out of core LPDTV transition date of December 31, 2011 and a complete LPDTV transition date of December 31, 2012, would be reasonable. However, Harris would also support a final transition date in 2013 if the Commission determines, based on the input of the LPTV community, that such a transition date is more appropriate.

**I. HARRIS IS COMMITTED TO FACILITATING ALL BROADCASTERS CONVERSION TO DIGITAL BROADCASTING IN ORDER TO PROVIDE VIEWERS WITH NEW INNOVATIVE SERVICES.**

Harris is an international communications and information technology company serving government and commercial markets in more than 150 countries. Harris Broadcast Communications, a division of Harris, is headquartered in Mason, Ohio, and operates the world's largest transmitter manufacturing facility in Quincy, Illinois. As the world's leading broadcast transmission equipment supplier, Harris is the leader in digital solutions for television and radio broadcasting.

Harris Broadcast Communications has been at the forefront of the transition to DTV, both domestically and internationally. During the United States full-power DTV transition Harris supplied approximately 80% of the DTV transmitters and encoders. Harris is or has been involved in DTV transitions throughout the world, including in Australia, Brazil, Canada,

Russia, Rwanda, and Vietnam. Harris is committed to facilitating technological advancement within the broadcast industry and focused on helping broadcasters succeed as they transition to the world of digital media. Harris Broadcast Communications Division is an active member of industry and standard setting organizations.

**II. TO COMPLETE THE TRANSITION OF ALL TELEVISION STATIONS TO DIGITAL BROADCASTING THE COMMISSION SHOULD ESTABLISH A HARD TRANSITION DATE FOR CONVERTING LOW-POWER TELEVISION STATIONS TO DIGITAL OPERATIONS.**

According to the Commission's *FNPRM*, "56% of the existing 7,536 stations in the low power television services have taken steps to move toward digital operation."<sup>2</sup> Harris believes the time is ripe for the remaining 46% of low power stations to begin the process and all LPTV stations to complete the transition to digital broadcasting in the immediate future. Based on the progress of LPTV stations current voluntary digital transition efforts, combined with the need to finish clearing out channels 52-69 and the Commission's goal to maximize the use of broadcasters' spectrum, an out of core LPDTV transition date of December 31, 2011 and a final LPDTV transition date of December 31, 2012, would be reasonable. Harris would support a final LPDTV transition date in 2013 if, based on the comments of the LPTV broadcast community, the Commission deems such a date to be a more suitable. However, Harris does not believe that there is any added benefit to prolonging LPTV stations' digital transition beyond 2013.

In 2003 the Commission issued a *Notice of Proposed Rulemaking*<sup>3</sup> that set in motion steps to "establish a regulatory framework that will hasten the transition of LPTV and TV

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<sup>2</sup> *Id.* at 13835, ¶ 5.

<sup>3</sup> *See* Amendment of Parts 73 and 74 of the Commission's Rules to Establish Rules for Digital Low Power Television, Television Translator, and Television Booster Stations and to Amend Rules for Digital Class A

translator stations to digital operations....”<sup>4</sup> The Commission has determined that statute compels the various classes of LPTV broadcasters (*i.e.*, Low Power Television, Class A, and TV Translators) to ultimately convert to digital broadcasting.<sup>5</sup> While in its 2004 *Report and Order* the Commission adopted rules to facilitate the voluntary transition of LPTV stations to digital operations,<sup>6</sup> the Commission properly determined that it was not appropriate to mandate a LPDTV transition until after the completion of the full-power DTV transition.<sup>7</sup> In the *Report and Order* the Commission aimed to facilitate LPTV stations conversion to digital operation in a manner that was the least disruptive on LPTV broadcasters and viewers.<sup>8</sup> In particular, the Commission was concerned that LPTV stations may be disproportionately affected since the Commission was unable to provide LPTV stations with the spectrum needed to continue to provide analog and digital service to their viewers throughout the course of the DTV transition.<sup>9</sup> However, with the completion of the full-power DTV transition many of the transition concerns

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Television Stations, *Notice of Proposed Rulemaking*, MB Docket No. 03-185, 18 FCC Rcd 18365 (rel. Aug. 29, 2003) (“*LPTV Transition NPRM*”) (requesting comment on proposed rules for digital low power television).

<sup>4</sup>*Id.* at 18366, ¶ 2.

<sup>5</sup> “We conclude that Sections 309(j)(14)(A) and 336(f)(4) ultimately compel LPTV, TV translator and Class A stations to convert to digital. As an integral component of the nation’s television system, we believe that Congress intended LPTV, TV translator and Class A stations to transition to digital service. thereby permitting their viewers to realize the benefits of digital broadcast technology.” Amendment of Parts 73 and 74 of the Commission’s Rules to Establish Rules for Digital Low Power Television, Television Translator, and Television Booster Stations and to Amend Rules for Digital Class A Television Stations, *Report and Order*, MB Docket No. 03-185, 19 FCC Rcd. 19331, 19337, ¶ 13 (rel. Sept. 30, 2004) (“*LPTV Transition Report and Order*”); See 47 U.S.C. § 336(f)(4)(2006) and 47 U.S.C. § 309(j)(14)(A)(2006).

<sup>6</sup> See *Id.* at 19374-19384, ¶¶ 127-159 (establishing the rules for converting LPTV stations through digital companion channels and digital flash cut).

<sup>7</sup> “We conclude that the better, less disruptive, approach would be for the low power television digital transition to be completed at some fixed time after the deadline for full-service television stations.” *Id.* at 19338, ¶ 17.

<sup>8</sup> “Our goals in this proceeding are to establish a regulatory framework that will hasten the transition of LPTV and TV translator stations to digital operations and do so in a manner that minimizes disruption of existing service to the consumers served by analog LPTV and translator stations.” *LPTV Transition NPRM*, *supra* note 4.

<sup>9</sup> See *LPTV Transition Report and Order*, *supra* note 7, at 19337, ¶ 15.

expressed by the Commission in its *Report and Order* are no longer applicable.<sup>10</sup> By waiting until after the full-power television transition was complete to mandate a LPDTV transition, the Commission can now provide LPTV stations the “opportunity to operate dual analog and digital operations for some period of time, thereby creating an incentive and opportunity for their viewers to transition to digital service without loss of their existing analog service.”<sup>11</sup>

LPTV broadcasters provide a unique hyper-local service to many unserved communities, underserved communities, and niche viewers. Converting LPTV broadcasters from analog to digital operations will afford LPTV stations the opportunity to offer viewers new services with added public interest benefits. Through the utilization of digital technology LPTV broadcasters will be able to take advantage of a number of new and innovative service offerings, just as full power broadcasters have started to do, in addition to their traditional broadcasting services. For example, digital broadcasting could enable LPTV stations to offer High Definition programming, multicasting, Mobile DTV, real time and non-real time data services, interactive wireless services, and many other ancillary services including Internet access. In addition, providing LPTV stations the ability to offer advanced digital services to viewers will increase their competitiveness in the media marketplace.

In order to provide LPTV broadcasters with a reasonable amount of time to complete their DTV transition, especially those that have not yet started the transition process, the Commission should act expeditiously to conclude the current proceeding and establish a hard transition deadline. Due to the constraints and nature of LPTV broadcasters (*i.e.*, low revenue, niche viewership, and hyper-local content) Harris believes the Commission should establish a

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<sup>10</sup> *Id.* at 19337-19338, ¶¶ 15-17.

<sup>11</sup> *Id.* at 19338, ¶ 17.

process to address “hardship” cases.<sup>12</sup> The Commission should require LPTV stations requesting an extension of the mandated LPDTV transition deadline to file a *Request for Waiver* in accordance with the Commission’s waiver rules.<sup>13</sup> In addition to meeting the Commission’s threshold waiver requirements, Petitioners should be required to demonstrate that they have made a good faith effort to make a timely transition and provide detailed information, financial or otherwise, as to why they will be unable to meet the mandated deadline.

### **III. THE COMMISSION SHOULD WAIT TO TAKE ANY ACTION THAT WOULD REPACK OR REALLOCATE CURRENT BROADCASTING SPECTRUM UNTIL ALL TELEVISION SERVICES ARE CONVERTED TO DIGITAL OPERATIONS.**

Harris does not believe that the Commission should delay the LPDTV transition until 2015, following the conclusion of any reallocation or repacking of the broadcast television bands as proposed in the National Broadband Plan.<sup>14</sup> In fact, the Commission’s approach should be the opposite. The Commission should wait until the completion of the LPDTV transition before taking any steps to repack or reallocate existing broadcast television spectrum. Doing so will provide the Commission with a full understanding of television broadcasters’ digital spectrum allocations and capabilities. It will also allow the Commission to better determine precisely what efficiencies can be gained from the broadcast spectrum that may not require repacking or reallocation.

Broadcasters’ ability to serve one-to-many is unique across all communications services. Broadcasting provides the public with a hyper-local, free, ubiquitous, point-to-many

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<sup>12</sup> “Furthermore, we seek comment on how to address “hardship” cases for those stations that, despite their best efforts, are unable to make a timely conversion.” *LPTV Transition FNPRM*, *supra* note 2, at 13838, ¶ 16.

<sup>13</sup> 47 C.F.R. § 1.925(b)(3) (2009).

<sup>14</sup> See Report to Congress, A National Broadband Plan for Our Future, Federal Communications Commission, pgs. 88-93 (rel. Mar. 16, 2009) (discussing methods to repack and reallocate existing television broadcast spectrum allocations).

communications network that is distinct from any other wireless service. The LPDTV transition will not only provide additional spectral efficiencies, but new service opportunities through the utilization of digital spectrum and digital broadcasting infrastructure. As previously advocated for by Harris, the Commission should provide broadcasters, low-power and full-power, the opportunity to take advantage of new digital broadcasting capabilities prior to pursuing any reallocation or repacking of broadcasters existing spectrum allocations.<sup>15</sup>

#### **IV. DIGITAL BROADCASTING TRANSMISSION EQUIPMENT IS READILY AVAILABLE AND MANUFACTURERS ARE PREPARED TO WORK WITH LOW POWER TELEVISION STATIONS ON THEIR DIGITAL TRANSITION.**

The full-power DTV transition has provided the broadcast manufacturing industry the experience and knowledge to swiftly transition LPTV stations to digital broadcasting technology. Harris stands ready to work with the LPTV community to facilitate a prompt and problem free transition. Harris' position as the leading supplier in the United States of broadcast transmission equipment uniquely qualifies Harris to comment on the cost of paying for a complete LPDTV transition.

Today, the cost of converting LPTV broadcasting facilities from analog to digital is less expensive than it cost during the full-power DTV transition. Digital broadcasting technology is in the mass adoption stage of its technology cycle, making equipment less costly for new adopters. LPTV stations will have the opportunity to benefit from economies of scale and cost efficiencies that have resulted from the full-power DTV transition in the United States and ongoing DTV transition efforts taking place throughout the world. In moving forward with the proposed LPDTV transition the Commission should also consider the energy consumption

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<sup>15</sup> See Comments of Harris Corporation, *A National Broadband Plan for Our Future, Data Sought on Uses of Spectrum Public Notice 26*, pgs. 7-13 (discussing new digital applications currently being rolled-out by broadcasters and encouraging the Commission to allow broadcasters time to develop and deploy new innovative digital applications).

efficiencies provided by new digital broadcast transmission equipment. Energy efficient DTV equipment will not only reduce LPTV stations impact on the environment, but will likely reduce operating costs.

While Harris will not provide comment on the financial ability of LPTV stations across the country to pay for converting their facilities to digital, a transition on or around December 31, 2012, would coincide with the availability of funding through the National Telecommunication and Information Administration's ("NTIA") LPTV and Translator Upgrade Grant Program (hereinafter "LPTV Grant Program").<sup>16</sup> Funding is available through the LPTV Grant Program until September 30, 2012.<sup>17</sup> Establishing a transition date of December 31, 2012, would incentivize LPTV stations to take advantage of the NTIA grant funding. Harris acknowledges that if a later LPDTV transition date is set LPTV stations will undoubtedly take advantage of the LPTV Grant Program, as is evidenced by the approximately \$10 million in fund already awarded. However, as seen during the full-power DTV transition, many LPTV stations will likely put off purchasing equipment for their transition as long as possible and potentially miss out on the opportunity to apply for grant funding and reduce their transition costs.

Incentivizing LPTV stations to utilize the LPTV Grant Program by setting a final LPDTV transition deadline for December 31, 2012, will ensure that the use of grant funding is maximized, reduce the number of waivers filed as a result of hardship, and promptly move the entire television broadcast industry to the efficiencies of digital technology. However, since only LPTV stations in "rural communities" are eligible to receive grant funding from the LPTV Grant

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<sup>16</sup> The Digital Television and Public Safety Act of 2005, § 3009 of Pub. L. No. 109-171 (Deficit Reduction Act of 2005), 120 Stat. 4, 26 (Feb. 8, 2006) (establishing the LPTV Translator Upgrade Program) *amend by* Section 2(b) of the DTV Transition Assistance Act, Pub. L. No. 110-295, 122 Stat. 2872 (July 30, 2008) (amending Section 3009 to clarify the period during which NTIA could make awards for the LPTV and Translator Upgrade Program); *See* 74 F.R. 22402 (May 12, 2009) (announcing the availability of funding in the amount of \$44 million for the LPTV and Translator Upgrade Program).

<sup>17</sup> *Id.* at § 3009(a).

Program, Harris recommends that the Commission submit a request to Congress to expand the eligibility of the program to include all LPTV stations. At minimum, the Commission should recommend to Congress that the LPTV Grant Program be expanded to include any LPTV station, regardless of location, that can demonstrate an inability to meet the Commission's mandated LPDTV Transition date due to financial hardship.

**V. HARRIS PROVIDES COMMENT ON A NUMBER OF ADDITIONAL TECHNICAL AND PROCEDURAL QUESTIONS POSED BY THE COMMISSIONS *FURTHER NOTICE OF PROPOSED RULEMAKING.***

1. Harris Endorses the Proposed Commission Filing Freeze on Certain Analog and Digital Low-Power Television Applications.<sup>18</sup>

Harris believes the Commission should dismiss pending applications for new analog LPTV facilities that have not amended their applications to specify digital facilities after May 24, 2010. In addition, Harris endorses the Commission's initiation of a filing freeze on applications for new analog LPTV facilities and new or modified analog or digital LPTV facilities in channels 52-69. Instituting this filing freeze is important if the Commission is to promptly begin the process of converting LPTV stations from analog to digital operations and facilitate the deployment of new services in the 700 MHz spectrum band.

2.  Holders of Active Digital Construction Permits Should Not Be Required to Surrender Their Permit Because of the Expiration of an Associated Analog Construction Permit That Was Not Utilized.<sup>19</sup>

An entities active digital construction permit should not be forfeited because of the expiration of an associated analog construction permit that was not utilized. The holder of an active digital construction permit should be allotted the time to build-out their digital facility as specified in the permit. However, it would be appropriate for the Commission to send a letter of

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<sup>18</sup> *LPTV Transition FNPRM*, *supra* note 11, at 13842-13843, ¶¶ 26-28.

<sup>19</sup> *Id.* at 13843-13844, ¶¶ 29-31.

inquiry to the holder of an expired analog construction permit but active associated digital construction permit seeking written confirmation that they still plan on building out a digital facility within the timeframe specified by their digital construction permit. Should the Commission fail to receive confirmation from the permit holder within a reasonable period of time, for example 60 days, then the Commission should initiate a proceeding to rescind the digital construction permit.

3. Class A Stations Should Be Extended Primary, Protected Status for their Digital Allocation After Ceasing Analog Operations.<sup>20</sup>

Harris agrees with the Commission that Class A stations' digital channels should be extended primary, protected status. Harris also agrees with the Commission's proposed process for Class A TV stations to obtain their primary, protected status, including the filing of a minor change application and certification that their proposed facilities meet Class A interference protection requirements. However, Class A stations digital channels should only receive primary, protected status when the station completes its digital transition and ceases analog operations.

4. Harris Endorses the Commission's Proposal to Expand the "30 Mile Rule" to Determine What is Considered a Low Power Television Minor Application Change.<sup>21</sup>

The use of the "30 mile rule" to determine what constitutes a LPTV minor application change is an appropriate threshold. Harris believes that the "30 mile rule" provides LPTV stations with sufficient flexibility to adjust their transmitter site, if necessary, without violating the intent of the Commission's minor change rule. Adoption of the "30 mile rule" will also help ensure that broadcasters spectrum allocations are maintained in a manner that allows for the greatest utilization of the spectrum band.

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<sup>20</sup> Id. at 13844, ¶¶ 32-33.

<sup>21</sup> Id. at 13845-13846, ¶¶ 37-39.

5. The Commission Should Obtain Actual Vertical Radiation Patterns for All Low Power Television Stations to Maximize Use of Broadcasters Spectrum.<sup>22</sup>

Harris agrees with the Commission that the use of actual vertical patterns would be a more accurate predictor of vertical radiation patterns. If you use something other than the actual pattern of the antenna (*i.e.*, the current estimated model) it could impact the amount of coverage prediction. The use of actual vertical patterns would be much more accurate. If adopted Harris would support the framework proposed by the Commission for collecting proposed LPTV facilities actual vertical radiation patterns and allowing existing stations to voluntarily submit minor change applications to provide actual vertical radiation patterns. However, to obtain the full benefits of actual vertical radiation patterns and maximize the utilization of broadcasters existing spectrum allocations Harris would encourage the Commission to dedicate the resources to obtain all existing LPTV stations actual antenna vertical radiation patterns. Prior to reallocating or repacking any of broadcasters' current spectrum allocations the Commission should make all efforts to facilitate the maximum utilization of broadcaster's spectrum. The Commission could do this by engaging in an effort to collect existing stations actual vertical radiation patterns as part of the LPTV digital transition process. For stations that have already filed for digital flash cut and digital companion channels the Commission could require those stations submit a minor change application. For stations that have yet to start the digital transition process the information could be collected as part of LPTV stations' digital flash cut or digital companion channel application process.

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<sup>22</sup> Id. at 13846-13848, ¶¶ 40-43.

6. The Commission Should Maintain Full Power Emission Masks for Low-Power Television Stations to Prevent Interference.<sup>23</sup>

The use of full-power emission mask should be maintained by LPTV stations. Maintaining full-power emissions masks for LPTV stations will be critical to prevent interference where multiple low power stations are placed against high power stations spectrum allocations. Utilizing full-power emissions masks in the broadcast spectrum is crucial to facilitate proper spectrum planning. Without requiring adherence to full-power emissions masks the Commission increases the likelihood of creating adjacent channel interference.

**VI. CONCLUSION.**

For the foregoing reasons, Harris recommends an out of core LPDTV transition date of December 31, 2011 and a final LPDTV transition date of December 31, 2012. However, Harris would support a final LPDTV transition date in 2013 should the Commission determine, based on input from the LPTV community, that such a date is more appropriate. Broadcasters' ability to serve one-to-many is unique across all communications services and the hyper-local benefits provided by LPTV and full-power broadcasters cannot be overlooked. Mandating LPTV stations to convert to digital operations will provide additional spectral efficiencies in the broadcast spectrum band, offer innovative business opportunities to LPTV stations, and provide new public interest benefits to viewers. Harris looks forward to working with the LPTV community to facilitate their transition to digital broadcasting.

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<sup>23</sup> Id. at 13848, ¶ 44.

Respectfully submitted,

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