

I'm writing to express my extreme concern over the FCCs' proposed confiscation of an additional 120 MHz of RF spectrum currently licensed to, and used by DTV broadcasters. In many respects the FCC proposed broadband initiatives are good and will serve the public well in the future but "re-purposing" these DTV frequencies for mobile broadband is not, in my opinion, in the publics' best interest (It is however in the big telcos' interest since they offer mobile broadband as a premium service with enormous profit margins).

After the OTA viewing public and broadcasters have just spent countless money, time and effort to upgrade their equipment for digital transmission, the FCC is proposing to undermine these efforts and diminish the video quality and diversity by crowding the DTV transmissions into 1/3rd the bandwidth previously available pre-transition. Their prescription for dual use channels is not feasible for full HD-ATSC video transmission which requires ~ 19 Mb/s and the full 6 MHz bandwidth. A lower resolution 1280 x 720p or 720i dual use might be feasible but there are many issues including adjacent channel interference, lost sub-channels, etc. that would need to be resolved, and again, the video quality would be seriously compromised. The digital transition has already relinquished over 100 MHz of bandwidth (the 700MHz bands recently auctioned off to the telcos last year), and hardly any of that has been used by Verizon and the other successful telcom bidders. With the current pricing structure for mobile broadband, and the prevalent depressed economic conditions, the projected demand and timing for future expanded mobile broadband service is wildly optimistic. I believe the FCC proposal has grossly overstated the need and economic benefits of mobile broadband, and I totally disagree with their opinion that this would be a better and more efficient use of this publicly owned resource.

As for wired broadband, the telcos and cable companies are building out their fiber-optic networks rapidly and wired broadband internet access is already available to over 90% of American households and businesses (probably closer to 97% if you include the low tier DSL over copper service offered by most telcos). So why is the FCC touting mobile broadband as being so important? Is the ability to up and download video to youtube or facebook on our smartphones really going to have a great impact on the nations economy or well being? Is the ability to download the latest reality show episode on the way to work really necessary or in the best public interest? Texting and cellphone activity while driving is already becoming a serious public safety concern. Video telephony is often cited as a major end use of mobile broadband and while it might be interesting to see who you're talking to or catch the last few minutes of a sporting event while on the road, it's hardly a necessity or a compelling public need. Free broadcast TV however is. Over 10% of the American public (and I think that is a significant underestimate) rely on OTA broadcasts for their news, information and entertainment and that number is growing as people begin to realize the superior picture quality now available for free over the air and as cable and satellite subscription rates continue to rise. Is mobile broadband a more

efficient use of the RF spectrum? The revised FCC definition of broadband service is 4 Mbps download & 1 Mbps upload. At best a 6MHz wide spectrum might be able to serve 10 users/LT simultaneously if advanced data compression and multiplexing is used. Multiplied over many LTs located in a large, densely populated urban area that might mean a few hundred to maybe a few thousand users could be using that frequency spectrum at one time. Compare that to the several million viewers a single DTV broadcast can reach in that same urban locale with that same spectrum and I think it's clear which medium is more efficient and offers greater value to the public. Couple that with the fact that broadcast radio and tv is the primary medium for emergency broadcast announcements to millions of citizens and, I believe, you have an overwhelming case for preserving the current RF broadcast spectrum allocations.

I hope and urge the FCC to support the publics' best interest and not that of the telcom lobbyists and special interests seeking to lockup access to a public resource for their own profit. Also, I would strongly urge the FCC to stop using the terms broadband and mobile broadband interchangeably. While reliable, widespread wired broadband internet access may be of vital future economic interest to this country, proliferating Mobile broadband access largely benefits the telcos and a rather narrow segment of the population. BTW, while I do own stock in AT&T, Verizon, Alcatel-Lucent, and Comcast, I have no stock or financial interests in any TV network or broadcaster. I do, however own a TV set and an antenna and get my reception OTA as do millions of other citizens.