

March 18, 2011

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th St. S.W.  
Washington, DC 20554

**Re: ET Docket No. 10-235**

Dear Ms. Dortch:

WBOC, Inc., licensee of WBOC-TV ("WBOC"), Salisbury, Maryland, files this letter to apprise the Commission of developments concerning WBOC's now-terminated attempted experiment in providing two "high-definition" program streams on WBOC's 6 MHz channel allotment, using statistical multiplexing technology.

In a previous filing with the Commission, WBOC described its experimental efforts to provide two programming streams in "high-definition" and noted the impracticability of actually providing two *full* HDTV-quality streams (1080i and 720p).<sup>1</sup> WBOC's previous filing was made to clarify an earlier submission drafted by the FCC staff, which did not fully capture WBOC's experience or convey WBOC's belief that the difficulties of providing two "high-definition" streams underscore the importance of ensuring that channel-sharing be done on a voluntary basis. (The National Broadband Plan had cited that first filing only for the proposition that "[t]wo stations could generally broadcast one primary HD video stream each over a shared six-megahertz channel."<sup>2</sup>)

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<sup>1</sup> See *Ex Parte Letter* of WBOC, Inc., Docket Nos. 09-47, 09-137, and 09-51 (Jan. 29, 2009) ("the equipment does not permit two streams to be carried in *full* 1080i and full 720p HDTV quality"). WBOC also pointed to drawbacks with the use of statistical multiplexing technology, including the fact that switching from providing two "high-definition" streams to one high-definition stream and one standard-definition stream temporarily disrupted programming.

<sup>2</sup> See National Broadband Plan at 90 and n.98.

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WBOC terminated these experimental efforts in early 2010, and since that time has been providing one HDTV-quality programming stream and one standard definition programming stream. In light of WBOC's experience with the problems providing two HD-quality streams on one 6 MHz channel—and the need to reserve capacity to provide mobile DTV services, which WBOC is interested in providing—WBOC reiterates its earlier position and therefore agrees with the Commission's proposal that channel sharing should be permitted on a *voluntary* basis and not required of any station.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Craig Jahelka", with a long horizontal flourish extending to the right.

Craig Jahelka  
Vice President and General Manager