



March 29, 2011

Via Electronic Filing

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, D.C. 20554

Re: Ex Parte Notice, Docket No. MB 10-235

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 1.1200, *et seq.*, Harris Corporation (“Harris”) hereby notifies the Federal Communications Commission (“Commission”) of the following ex parte communication in the above-referenced proceeding. On March 25, 2011, Jay Adrick and Evan Morris of Harris, and Mark Richer of the Advanced Television Systems Committee (“ATSC”) met with Charles Mathias and Jennifer Tatel of the Office of Commissioner Meredith Atwell Baker. A copy of Harris’ presentation has been filed concurrently with this Ex Parte Notice and provided via e-mail to the aforementioned members of the Commission. ATSC has filed a separate Ex Parte Notice in this proceeding.

Harris’ presentation focused on the implementation of the ATSC standard, discussing both current uses of the ATSC Standard in broadcast equipment—such as High Definition Television (“HDTV”) and Mobile Digital Television (“MDTV”)—as well as emerging uses of the ATSC Standard for new broadcast services—such as non real time services (“NRT”). Harris noted to Commission staff that the broadcast industry, utilizing the flexibility of the ATSC Standard, is in the midst of a technological renaissance. The nationwide deployment of MDTV equipment and establishment of MDTV service signifies the start of broadcasters’ ability to offer new innovative mobile services in addition to traditional linear video services. To date, there are approximately 70 stations that have deployed MDTV platforms. That number is expected to climb to 200 station deployments by the end of calendar year 2011. During its presentation Harris also outlined the bandwidth requirements for broadcasters to offer MDTV services in conjunction with their existing DTV services and highlighted the technical restrictions on broadcasters’ use of the VHF spectrum for MDTV services. All data provided on broadcaster’s MDTV bandwidth requirements and MDTV reception issues in the VHF band are provided in that attached presentation.

As part of its presentation Harris made the following recommendations to the Commission:

1. Broadcast equipment manufacturers are continuously innovating and exploring ways to implement greater efficiencies in equipment in order to maximize the power of the ATSC Standard and broadcasters’ use of bandwidth. Conclusions regarding broadcasters’ bandwidth needs must be informed and based not only on broadcasters’ current needs, but



also on their future spectral needs. Broadcasters should not be foreclosed from both maintaining their current level of service and providing new services, such as MDTV, 3DTV, and NRT.

2. Reception and signal strength issues restrict broadcasters' ability to offer MDTV services in the VHF spectrum band. While the Commission's recommendations in the most recent Notice of Proposed Rulemaking are positive for increasing reception to traditional DTV devices, they will not resolve reception issues for MDTV devices in the VHF band. In order to receive a MDTV signal in the VHF band that is equivalent to that of a MDTV signal in the UHF band, a mobile device will require an antenna that is nearly 8.5 inch in length, something that is impractical for a mobile device. Broadcasters should not be forced to relocate from UHF to VHF spectrum. Such a requirement would limit their ability to take advantage of current and future MDTV services.
3. The Commission must better understand the growing noise floor that is being caused by new technology and consumer appliances. In order to extract the greatest value from all spectrum bands, especially the VHF spectrum band, Harris recommends that Commission conduct a study to better understand the rising noise floor and determine how Commission rules can be modified to minimize the noise floors' impact on device reception. This noise floor study should be conducted with input from other appropriate federal government agencies.
4. Any channel sharing or auction paradigm must be implemented on a voluntary basis and provide broadcasters the ability to maintain their current level of service (HDTV and MDTV) and implement new service offerings (3DTV and NRT).

Respectfully submitted,

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Evan S. Morris, Esq.
Counsel, Government Relations
Harris Corporation

Attachments (1)

CC (via electronic mail):
Charles Mathias, Senior Legal Advisor, Office of Commissioner Meredith Atwell Baker
Jennifer Tatel, Legal Advisor, Office of Commissioner Meredith Atwell Baker