



Statement of
David L. Donovan
President
Association for Maximum Service Television, Inc.

Before the
Federal Communications Commission
June 3, 2009

Good morning Mr. Chairman, Commissioner McDowell and Commissioner Adelstein. My name is David Donovan and I am president of the Association for Maximum Service Television, Inc. (MSTV). As you know, MSTV is the leading technical trade association representing the television broadcasting industry.

I am delighted to appear before you today to discuss the digital transition, which will be completed in nine days. We have worked tirelessly over the past decade to develop the best local digital broadcast system in the world and to ensure a smooth transition. I want to thank you, Mr. Chairman, and your fellow Commissioners for your efforts, and focusing the Commission's resources on this important transition. I want to thank your personal staffs, the Media Bureau and the Office of Engineering and Technology for their tremendous work. The public-private partnership has worked.

Over the past few months, we have increased our technical coordination with local stations to prepare them for the transition. Our Engineering Committee continues to meet on a regular basis. This Committee has become an important forum for disseminating information and solutions about reception and technical problems that may occur on June 12, 2009.

MSTV continues to provide the technical coordination with the cable and satellite industries. I want to thank the NCTA and the American Cable Association for coordinating with local television stations. While there may be a few bumps in the road, we believe this part of the transition should proceed well. Yesterday's decision allowing stations to transition earlier in the day on June 12, 2009, should help these coordination efforts, because stations can work out any coordination problems during the day.

We worked extensively with DirecTV and the DISH Network. I want to thank both companies for their efforts. On February 17, 2009, we discovered one issue concerning satellite subscribers that use an antenna to receive local signals. Many of these subscribers tune to local stations by using the program guide, allowing for a seamless viewing experience. To work effectively however, it requires coordinating channel change information among the stations, Tribune Media Services, who supplies programming information, and the satellite services. We established a process for exchanging information, which should attenuate much of the problem.

MSTV has been working closely with the Media Bureau, NAB and the Association for Public Television Stations to encourage stations to participate in the Analog Nightlight Program. We have focused our attention on the target “hot spot” markets identified by the FCC. I am happy to report that we have secured nightlight participation in 41 of the 49 targeted “hot spot” markets. In some of the remaining markets, there are simply no options available as some analog transmitters were turned off on February 17, 2009, and were dismantled. In other instances, there are technical issues that prevent participation. I want to thank the television broadcasters in these markets who are willing to bear the significant operational costs during tough economic times to participate in this voluntary program. We will continue to work closely with the Media Bureau to try to work out solutions for the remaining eight markets.

At our last hearing, we discussed the need to refocus consumer education to highlight technical issues such as antennas and converter box installation. NAB deserves a lot of credit for revising its educational messages to meet this need. In addition, the NAB messages concerning the need for consumers to re-scan for channels on June 12, 2009, are extremely important.

I would like to address some additional reception and interference issues. At the last hearing, we discussed issues relating primarily to UHF coverage. MSTV supports the steps taken by the FCC, including its rules regarding

distributed transmission and the translator fill in service. These important tools can be used to provide full coverage. Most recently, there have been some concerns regarding reception of digital stations operating in the VHF band as well as the UHF band.

As with any new technology, it will take time to work out all the reception and interference issues. Quality reception is based on three factors: 1) the signals being transmitted, 2) the equipment used to receive the signal and 3) the interference environment. It took nearly years to work out reception issues in the analog service. We are just beginning our experience with digital services.

Approximately 40 television stations will remain in the low VHF band (channels 2-6) after the transition and 453 will operate on high VHF channels (7-13). Approximately 300 stations currently operating in digital in the UHF band will be shifting back to VHF channels. After June 12, 2009, 2.2% of stations will operate in the low VHF band, 25% will operate in the high VHF band, and 72.8% will operate in the UHF band. In other words, many of today's low VHF stations will be moving to the UHF band. When coupled with the removal of broadcast stations from channels 52-69, the remaining UHF band (channels 14-51) will become very crowded.

Nevertheless, 27.2% of all stations will remain in the VHF band. Moreover, with many stations returning to high VHF channels, we need to

examine these facilities. We have some experience with VHF digital reception as approximately 152 digital VHF stations have been operating since February 17, 2009. Thus, we have some anecdotal evidence based on these stations. It is not a complete record and the problems and potential solutions will vary considerably from market to market. Frankly, we are just learning which tools and mechanisms will be needed to improve services. Some initial observations:

- Stations operating on low VHF channels may have an issue in some areas with significant sources of low impulse noise.
- For some stations, maximizing or increasing power, for both UHF and VHF stations, may be necessary to improve service. This will vary from market to market.
- Using the correct antenna is very important. Some DTV indoor antennas are in fact UHF-only antennas, making it difficult to receive all VHF signals. Antenna manufacturers and retailers must understand that 27.2% of the television industry will be broadcasting in the VHF band.
- Some consumers are using “pre-amped antennas” close to a broadcast tower, which may undermine reception by overloading the TV set.
- Many reception complaints are resolved within a few weeks.

There is one lesson that we are learning. Whether it is low impulse noise or other forms of ambient noise, interference is a key issue in digital reception. As the FCC itself has found, the manifestation of interference in the digital environment is far more dramatic than in the analog world. Where interference in analog may create some wavy lines and is annoying, interference in the digital world leads to a loss of picture and sound. We hope the Commission considers this fact as it moves forward with efforts to introduce additional non-broadcast transmitting devices on television frequencies.

Because we are in a problem-solving mode, it is proper to focus on the issues that are necessary to improve service. Nevertheless, we should not lose sight of the fact that this digital system works very well. Viewers are amazed at the quality of over-the-air HDTV, which is generally superior to HDTV obtained through other services. Consumers using digital-to-analog converter boxes marvel at the quality of their picture as well as the additional channels that are available. Indeed, during these tough economic times, the completion of a new free over-the-air digital television service will be a tremendous benefit to consumers. I believe it is the most pro-consumer action taken by this agency. To be sure, there will be some bumps in the road. However, the industry and the FCC can be justifiably proud about bringing this new service to the American people.