

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Third Periodic Review of the)	MB Docket No. 07-91
Commission's Rules and Policies)	
Affecting the Conversion to Digital Television)	
)	

To: The Commission

**REPLY OF THE ASSOCIATION FOR MAXIMUM SERVICE TELEVISION, INC. AND
THE NATIONAL ASSOCIATION OF BROADCASTERS**

The Association for Maximum Service Television, Inc. ("MSTV")¹ and the National Association of Broadcasters ("NAB")² hereby respond to the Opposition filed by John M. Wilkie in the above-captioned proceeding.³ As explained in our Petition for Reconsideration, MSTV and NAB support adoption of the new PSIP standard but respectfully request that the Commission extend by one year (until May 29, 2009) the deadline for the implementation of that standard. Ordering and installing the software and hardware needed to comply with the new standard will take a significant investment of resources and time, especially for smaller stations already struggling with the burdens of the digital transition. Thus, we believe that a one-year delay in implementing the standard is warranted. We also ask that the Commission clarify that it

¹ MSTV is a nonprofit trade association of local broadcast television stations committed to achieving and maintaining the highest technical quality of the local broadcast system.

² NAB is a nonprofit trade association that advocates on behalf of more than 8,300 free, local radio and television stations and also broadcast networks before Congress, the Federal Communications Commission, the Courts, and other federal agencies.

³ See *Third Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television*, MB Docket No. 07-91, Opposition of John M. Wilkie (March 10, 2008) ("Wilkie Opposition").

did not intend to impose requirements that extend beyond the requirements of PSIP, such as providing real-time updates to Event Information Tables and specifying a program's definition.

I. THE COMMISSION SHOULD RECONSIDER THE EFFECTIVE DATE BY WHICH BROADCASTERS MUST IMPLEMENT THE NEW PSIP STANDARD AND CLARIFY THAT IT DID NOT INTEND TO IMPOSE REQUIREMENTS THAT GO BEYOND THE STANDARD.

As noted in MSTV and NAB's Petition for Reconsideration, broadcasters may not be able to deploy PSIP equipment that meets the new standard (A/65-C) by May 28, 2008. In order to implement the new PSIP standard, most broadcasters will need to install software and/or hardware upgrades to their PSIP generators. Ordering and installing these upgrades will take a significant amount of time, especially for smaller stations whose resources may already be strained with the digital buildout issues associated with the transition. Thus, a one-year extension of the deadline is warranted. We also respectfully ask that the Commission acknowledge that real-time updates to Event Information Tables ("EITs") require automation capabilities which will not be available for several years and which are permissive under the new PSIP standard.

The Wilkie Opposition characterizes MSTV and NAB's position in our Petition for Reconsideration as an assertion that "there is no requirement in ATSC A/65B for program listings to be accurate, or that an update schedule is mandated."⁴ That characterization is incorrect. In our Petition for Reconsideration, we observed that the A/65-C standard does not require real-time updates of program overages, and we brought to the Commission's attention the technological challenges that stations face as they deploy the new standard and supporting equipment. The Wilkie Opposition confuses two key issues: how quickly commands must be

⁴ Wilkie Opposition at 4.

sent to the PSIP generator and how quickly the PSIP generator must generate and emit updated EITs. Real-time EIT updates depend on how quickly both of these functions can be accomplished. ATSC A/65-C-compliant PSIP systems can rapidly generate new EIT tables and emit them in the proper structure. But those updates turn on how quickly stations can provide updated information to the PSIP generator. The ATSC A/65-C standard does not set forth any requirements on how promptly those updates must be provided, and a clarification on this point is warranted.

MSTV and NAB agree that prompt updates to EITs are valuable for viewers. The reality is that real-time EIT updates would require virtually instantaneous human decision-making as well as automation of inputs to the PSIP generator.

When events run for longer than their scheduled time, there is a ripple effect on later programs: should the next program be shortened so that following programs can start on-schedule? Should the next program run in full, delaying the start-time(s) and/or requiring shortening of later program(s)? Should the entire broadcast day be extended? Station personnel need time to make these decisions when it appears that a program will run long. And they may need to delay making these decisions until it is known by how long the first program will be over-time.

Moreover, automation of real-time inputs to the PSIP generator to reflect that a program is running long will not be feasible for most stations as a technical matter for several years. Harris Corporation has explained that:

Harris is in the process of testing a new product which will enable automated updating of PSIP information from its ADC Automation System (the most widely deployed Master Control Automation System in the US) to the station's PSIP generator.... However, this product is not expected to be generally available to US broadcasters until mid-2008. Deploying this software at the

hundreds of US over the air ADC stations will take at least one full year, as it not only requires the installation of new software products at these stations, but also requires that these stations upgrade to the latest versions of their automation systems as well as their PSIP Generators. With both of these being mission-critical on-air systems, such upgrades must be carefully planned and executed.⁵

MSTV and NAB understand that some stations today have third-party systems that permit rapid program listing changes. We also understand that these systems require station personnel to initiate a program line-up/time change; it is not automated. If a program were to run over-time, personnel at these stations would need to enter this information manually into the PSIP generator.⁶ In any event, setting aside these technical challenges, we reiterate that the ATSC A/65-C standard applies to only one part of the system and simply does not require real-time EIT updates.

II. THE COMMISSION SHOULD CLARIFY THAT USE OF PSIP TO PROVIDE INFORMATION ON THE DEFINITION OF PROGRAMMING IS PERMISSIVE.

The A/65-C standard does not provide a separate field in which to identify a program's definition. The Wilkie Opposition does not dispute this point, arguing instead that broadcasters could describe a program's definition in the EIT's title field or in the event description field of the optional Extended Event Text Table ("EITT").⁷ By definition, the EITT is optional under the standard. Nor does the EIT's title field require a description of the

⁵ See *Third Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television*, MB Docket No. 07-91, Petition for Reconsideration of Harris Corporation at 3-4 (February 28, 2008).

⁶ While stations may be able to update the PSIP information manually, the interfaces are complex and mistakes can have serious consequences on the integrity of the emitted PSIP signal. Thus, we disagree with the Wilkie Opposition's assertion that the PSIP updates are as simple for station personnel to handle as creating an on-screen banner regarding breaking news.

⁷ See Wilkie Opposition at 5.

program's definition.⁸ We do not believe that the Commission, by saying in the *Report and Order* that broadcasters "should" use PSIP to provide information on a program's definition, intended to go beyond the requirements set forth in the A/65-C standard. Clarification on this point is therefore warranted.

* * *

For the reasons set forth above, MSTV and NAB respectfully request that the Commission reconsider and clarify the *Report and Order*.

⁸ The model EIT in the standard provides example program titles of "Soccer Live," "Golf Report," and "Car Racing," with no indication of whether these programs are broadcast in SD or HD.

Respectfully submitted,

/s/

Marsha J. MacBride
Jane E. Mago
Ann West Bobeck
Lynn Claudy
Art Allison
NATIONAL ASSOCIATION OF BROADCASTERS
1771 N Street, NW
Washington, DC 20036
(202) 449-5430

/s/

David L. Donovan
Victor Tawil
ASSOCIATION FOR MAXIMUM
SERVICE TELEVISION, INC.
4100 Wisconsin Avenue, NW
Washington, D.C. 20016
(202) 966-1956



Jennifer A. Johnson
Eve R. Pogoriler
COVINGTON & BURLING LLP
1201 Pennsylvania Avenue, N.W.
Washington, DC 20004-2401
(202) 662-6000
*Counsel for the Association of Maximum
Service Television, Inc.*

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