



FCC Continues Incentive Auction Action

The End of Low Power Analog TV Broadcasting is Postponed

The transition from analog to digital broadcasting has certainly had a long run. First came the phased in deadlines for broadcasters to begin digital TV transmissions, extending from 1999 to 2003, depending on network affiliate status and market size. Then came the phased-in mandate for digital tuning capability in television receivers, extending from 2004 to 2007, depending on screen size and device type. Then analog television transmissions for full power stations were required to cease by 12 June 2009, which is largely considered to be the end of the DTV transition in the U.S. But it wasn't the end entirely—low power TV and TV translator stations have been allowed to continue analog broadcasting. In 2011, the FCC established a September 2015 deadline for all low power stations to cease analog broadcasting.



Fast forwarding to 10 October 2014, the FCC has released its Third Notice of Proposed Rulemaking on LPTV and translator station issues, noting that 56% of LPTV and 80% of TV translator stations have completed their digital transition, leaving 795 LPTV and 779 TV translator stations still operating in analog. Meanwhile, the timing of the incentive auction is still slated for 2015, which will significantly impact many LPTV and translator stations, requiring digital conversion on top of the issues surrounding channel repacking. This confluence of issues led the FCC to conclude that the September 2015 deadline for digital conversion of LPTV and translator stations should be postponed. The NPRM seeks comment on whether a new deadline should be established now, or before the incentive auction or after the incentive auction is complete. In any case, the intent will continue to be to set a "hard" deadline, with comment also being sought on that intention.

Spectrum for LPTV and translator station operations will necessarily be more scarce after the auction due to the reallocation of part of the UHF TV band in the forward auction. Accordingly, the FCC proposes to permit channel sharing between LPTV and translator stations, along with corresponding rules. The Commission also seeks comment on whether to permit LPTV and translator stations to channel share with full power and Class A television stations.

As many full power stations are likely to need to change channels during the repacking process, the FCC proposes a new "digital-to-digital" replacement translator service in the NPRM that will allow full power television stations to recover lost digital service area resulting from the repacking process. While translators would continue to have "secondary" frequency use status, new digital-to-digital translator applications are proposed to have processing priority over LPTV applications, subject to a number of conditions.

End of the Road for Analog TV Sets May Be in Sight

With the last of any type of analog broadcasting in sight, the FCC brings up in the NPRM the intriguing notion of eliminating any obligation on the part of manufacturers to integrate analog tuners in future TV receivers. In 2002, the Commission used its authority under the All Channel Receiver Act of 1962 to phase in the requirement for digital broadcast tuning capability in all TV receivers by mid-2007. Over seven years after that milestone passed, with all full power stations and the majority of LPTV and TV translators already broadcasting in digital format, the question is posed in the NPRM whether analog capability is still needed in TV sets to protect consumers. A number of waivers for TV devices have already been granted in the past few years to alleviate incurring the manufacturing costs of analog tuners in receivers. Such waivers paved the way for the new TiVo Roamio series of DVRs, the Channelmaster DVR+, and others. The proposal in the NPRM would change paragraph 15.117 (b) of the Commission's rules by inserting the word "digital":

"TV broadcast receivers shall be capable of adequately receiving all digital channels allocated by the Commission to the television broadcast service."

The Low Power TV NPRM can be downloaded [here](#). Comments will be due 30 days after publication in the Federal Register.

The FCC Endeavors to Set Rules Governing Interference Between Broadcast and Mobile Broadband

Late on Friday October 17 the FCC released the text of their 2nd Report and Order and Further Notice of Proposed Rulemaking on Inter-Service Interference, referring to interference between broadcast television stations and wireless broadband service in the 600 MHz band, which will be created out of the incentive auction process. (The item had originally been slated to be considered as an agenda item at the open FCC meeting on October 17, but was adopted on circulation on October 16 and subsequently removed from the meeting agenda).

The Report and Order (R&O), in response to proposals for a cap on aggregate interference that broadcast stations will be allowed to receive from other stations, reaffirmed that its one-half percent limit on new interference will be applied on a pairwise station-to-station limit and rejected adoption of an aggregate interference limit. Additional measures of channel optimization procedures and special post-assignment modification processes were adopted for exceptional cases where a station is predicted to receive aggregate new interference in excess of one percent. The R&O also adopted the ISIX methodology (with certain modifications) proposed by the Commission in January 2014 by Public Notice for predicting inter-service interference, for use during the incentive auction.

In the Further Notice, the Commission seeks comment on proposed rules to govern interference between broadcast television and wireless broadband service in the 600 MHz band following the incentive auction. Among other detailed proposals, the Commission proposes a new OET Bulletin No. 74, which specifies use of the Longley-Rice methodology for predicting interference to broadcast television from mobile broadband services in the UHF band.

The R&O and FNPRM, along with appendices, can be found [here](#).

Important Dates and Upcoming Events

[SMPTE Annual Technical Conference](#)

October 20 - 23, 2014

Hollywood, CA

[CCW+SATCON](#)

November 12 - 13

New York, NY