NAB TV TechCheck

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FCC Proposes Rules for "Fill-in" Translators

On December 22, the FCC issued a Notice of Proposed Rulemaking to establish rules for replacement Digital Low Power Television Translator Stations (MB Docket No. 08-253). Comments were due January 12, 2009 and reply comments on January 22, 2009. NAB was joined by MSTV in filing both comments and reply comments.

The Notice proposed creation of a new "replacement" digital television translator service to permit full-service television stations to continue to provide service to viewers within their NTSC coverage area who have lost service as a result of those stations' digital transition.

The new translators were proposed to be directly associated with the station's license, not transferable, and be required to carry the main stations content 100% of the time. The use of either an on-frequency or a different frequency translator was proposed.

The FCC suggested that the assignments be limited to RF channels 2-59 and have "secondary" frequency use status. They proposed that the current Part 73 and 74 rules be used, with the addition of a new section to Part 74 to cover this special case.

Our comments agreed that the FCC should establish this new class of translators, while suggesting some additional provisions and some changes from those suggested by the Commission should apply.

NAB and MSTV requested that the Commission provide latitude in methodology for broadcasters to demonstrate the existence of a loss area. We requested that in addition to establishing loss areas calculated per OET 69, the Commission should allow broadcasters to establish (with field strength measurements conducted per §73.686(c)) that there is deficient field strength in such areas. We also requested deletion of the current mobile run requirement in that section for measuring smaller than 16 km^2 areas.

We urged that the Commission not assign unique call letters to each new translator. Although translators have historically received unique call letters, we pointed out that applying unique call letters to each new fill-in translator serves little or no purpose and may cause confusion. Because this particular class of translators can only be built and operated by full power television stations, we asserted that the Commission should conclude that the radio frequency band used and the station's Transport Stream ID (TSID) in the signal, taken together, meet any statutory or treaty requirement for unique identification that may apply. We strongly urged that the Commission must not break the system design by requiring that the emissions from these translators be identified with their own TSID numbers rather than the TSID of the primary station. We noted that requirement is actually covered by the FCC rules as the ATSC system standards are part of the Regulations. We pointed out the system design works best with bit-by-bit replication of the main broadcast signal on translators. A full PSIP generator to reconstruct all the underpinning data in each translator's emission can also be made to work, but is a more expensive alternative.

In response to the "secondary" status that was proposed, we urged that the Commission make it clear that these new translators should receive full protection from so-called "white space" devices.

We urged the translator construction period should be a year instead of six months to better reflect the realities of the unforeseen circumstances that could easily delay the building of a new translator.

The other comments that were filed included those by CEA; which supported our position by focusing on the need to require compliance with the ATSC Standards and not have differences between the main signal and the translator's signal. Several organizations with interest in the channels above 51 also filed; urging that those

channels not be among the possibilities because they (or their members) planned to build systems on the channels they had purchased immediately upon the cessation of NTSC broadcasts.

In our reply comments, we responded to this “new spectrum owners” objection to assignments in the channel 52-59 range pointing out that due to frequency scarcity one of those might be the only alternative available. We observed that due to the secondary status, few should be expected to be built and that conflicts were covered by the protection rules.

Frequently Asked Questions about the DTV Transition

The engineering consulting firm of Meintel, Sgrignoli and Wallace has prepared “A List of Frequency Asked Questions about the DTV Transition” specifically for broadcast engineer and technicians. The information provides simple questions that a DTV viewer might ask together with some straightforward answers for those questions. It also includes a glossary and links to other DTV Websites.