



June 28, 2010

The Honorable Julius Genachowski
Chairman
Federal Communications Commission
445 Twelfth Street SW, Eighth Floor
Washington DC 20554

Re: Broadcast Engineering Forum

Dear Chairman Genachowski:

America's free and local broadcast engineering community appreciated last week's opportunity to gather and discuss the technical aspects and implications of the National Broadband Plan and proposals to reallocate a portion of the broadcast television spectrum for wireless broadband service on a voluntary basis. We look forward to working with you, your fellow Commissioners, and agency staff in a fact-based process founded upon the engineering realities of sound spectrum management.

Broadcasters recognize the important policy goal of ensuring every American across the United States has access to broadband, and we commend you for your steadfast commitment to such a worthy objective. We strongly believe that America can have both the finest broadband and broadcasting system in the world, and the television engineering community stands ready to work with you to accomplish these synergistic twin goals.

We appreciate your assurances that any reclamation of broadcast television spectrum will be undertaken on a completely voluntary basis. We also fervently support the principle that any spectrum reclamation must not force a reduction in the number or quality of services potentially offered by broadcasters or a reduction in number of television homes served by broadcasters. As you know, digital broadcast offerings continue to flourish following the historic public-private partnership that helped usher in the next generation of television to American consumers. Collectively, untold billions of dollars were invested by broadcasters, government and consumers to ensure America's leadership edge in digital and high definition television, and the fruits of those investments are just beginning to be realized.

The Honorable Julius Genachowski

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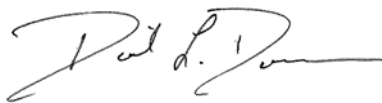
Page 2

Across America, in addition to ever increasing amounts of high definition programming, television stations are also providing multicast programs to expand their free and local lineup, offering viewers a panoply of program choice -- from news, weather and sports to niche educational programming for children and foreign language TV shows for America's growing immigrant community. Broadcasters are also embracing the next frontier -- live and local mobile DTV -- that will be delivered to "on-the-go" viewers via mobile handheld devices, laptops and the backseats of cars. The point to multipoint mobile DTV architecture will be critically important in meeting the demand for high quality mobile video services. Our system provides the most spectrally efficient means to meet the demand for high-quality wireless video that is transmitted simultaneously to millions of consumers.

In addition, the mobile DTV standard now being showcased in Washington, D.C. also supports non-real-time delivery of program content, allowing viewers to access the highly-rated programming offered by broadcasters and view it on their own schedule on mobile devices with local storage. This innovation will prove not only beneficial to viewers and television stations; it will also inevitably alleviate congestion experienced on wireless networks due to the increasing demand for mobile video.

Television broadcasting remains the most efficient way to deliver rich video to the masses, a fact reinforced in local towns and cities during a weather-related crisis, or nationally when President Obama addresses Americans from the Oval Office. The broadcast engineering community appreciates your outreach, and we look forward to working with the Commission and sharing our perspectives on how broadcasting and broadband can both benefit from the unique strengths of each technology platform.

Regards,



David Donovan
President
Association for Maximum Service
Television



Lynn Claudy
Senior Vice President, Science and
Technology
National Association of Broadcasters

cc: The Hon. Michael J. Copps
The Hon. Robert M. McDowell
The Hon. Mignon Clyburn
The Hon. Meredith Attwell Baker
Julius Knapp
William Lake
Rebecca Hanson