

Advocacy Submits Comment on the FCC's Notice of Proposed Rulemaking on Digital Broadcast Signals

On March 3, 2008, Advocacy filed a letter with the Federal Communications Commission ("FCC" or "Commission") in response to the Commission's February 1, 2008 request for comment on the proposed rule regarding "Carriage of Digital Television Broadcast Signals." The proposed rule deals with the transition from analog to digital television broadcast systems scheduled for February 17, 2009; specifically, it creates a "dual carriage" requirement, or requirement that cable systems provide consumers with both analog and digital signals. Advocacy's letter recommended alternatives to reduce the economic impact of the FCC's proposed rule on small cable providers.

- Advocacy urged the Commission to conduct a more thorough economic analysis of the impact that this rule will have on small cable providers, and to provide in that new analysis a proper consideration of alternatives in order to ensure that small cable providers are not unduly burdened in complying with the rule.
- The Commission is proposing to allow small cable providers to file for waivers from the requirements of the proposed rule. Advocacy is recommending that the rule designate small cable providers as exempt from the requirements of the rule in order to save them the substantial administrative and legal costs of filing the waivers. The Commission could also work with small cable providers to find other alternatives that would be less burdensome.

Information on the proposed rule can be found on the FCC website at: www.fcc.gov/cgb/ecfs/.

A complete copy of Advocacy's letter may be accessed at: <http://www.sba.gov/advo/laws/comments/>.

For more information, visit Advocacy's website at: <http://www.sba.gov/advo/> or contact Assistant Chief Counsel Cheryl Johns by e-mail at: cheryl.johns@sba.gov, or by phone at: (202) 205-6949.