

FCC INTERGOVERNMENTAL ADVISORY COMMITTEE

May 26, 2009

Honorable Michael J. Copps
OFFICE OF THE CHAIRMAN
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Digital Television Transition Comments and Recommendations of the FCC

Intergovernmental Advisory Committee

ADDITIONAL COMMENTS

Dear Acting Chairman Copps:

The Intergovernmental Advisory Committee (IAC) was appointed by the FCC to provide feedback on various issues coming before the FCC, particularly the transition to digital television. In that capacity, the members of the IAC have met monthly by teleconference and in person on a quarterly basis to discuss, among other matters, DTV issues, opportunities and challenges. Thank you for the opportunity for the IAC to provide your office with input on the upcoming transition from analog to digital television that the nation is preparing for this June 12, 2009.

Upon ongoing observation and review of the FCC's digital television transition and outreach plan, as well as feedback from soft tests and the early transition to digital

INTERGOVERNMENTAL ADVISORY COMMITTEE

Letter to Chairman Kevin J. Martin Re: Digital Television Transition May 26, 2009; Page 2

television in Wilmington, VA, and the January 15, 2009 transition in the state of Hawaii, the IAC has recognized a number of issues. The primary issues of concern at this time are: potential loss of service to over-the-air viewers and the methods by which broadcasters may alleviate those losses.

Potential Loss of Service

The IAC recognizes that the FCC has done an outstanding job of educating the public about the DTV transition. We applaud the increased public outreach efforts as well as the contracts recently awarded for walk-in centers, mobile clinics and in-home assistance nationwide. However, we are concerned that even with proper education, connections and equipment some consumers will still lose over-the-air television broadcasts.

People receiving analog broadcasts reasonably expect to be able to receive digital broadcasts by using a converter box or a television with a digital tuner. The reality in many places is that there is a significant likelihood that they will lose stations. In Honolulu, HI, for example, 1/7 of the population has lost the ability to pick up NBC over the air.¹ The IAC urges the FCC to highlight the risk of lost service in outreach and communications to consumers.

Options for Broadcasters

TV stations are not required by the FCC to replicate analog coverage after transitioning to digital broadcasting, and as stated above, many will lose coverage in their current contours. The Commission did, however, offer assistance to mitigate coverage losses through "translator" and "fill-in" stations.² The IAC appreciates these efforts, but encourages the FCC to (1) pursue funding through the American Recovery and Reinvestment Act (ARRA) to assist broadcasters in utilizing the above opportunities to maintain current areas of coverage and (2) to enhance the transparency of this

¹ "Map Book For Full Power Digital Television Stations Having Significant Changes in Coverage," FCC, http://www.fcc.gov/dtv/markets/report2.html.
² Sic.

INTERGOVERNMENTAL ADVISORY COMMITTEE

Letter to Chairman Kevin J. Martin Re: Digital Television Transition May 26, 2009; Page 3

process by increasing the availability of information to ascertain whether broadcasters are taking any of the suggested steps to increase coverage.

Conclusion

The IAC appreciates the work FCC staff has done in preparation and acknowledges the detailed technical information readily available on the improved www.DTV.gov website. The IAC encourages the increased efforts currently underway to reach the communities in need from now until June 12, 2009. In addition, the IAC urges the FCC to advise consumers about the risk of lost service associated with the transition, as well as to take the greatest measures possible to assist broadcasters to maintain current levels of coverage and to encourage broadcasters to maximize their DTV broadcast reach.

The IAC will continue to monitor progress of the DTV transition plan and to work with the FCC to improve Tribal, lower income, minority, elderly and non-English speaking community outreach and education about the transition. Thank you once again for the opportunity to participate in this important process and for the Commission's consideration of the above comments and recommendations.

Sincerely.

Haley Barbour, Chair

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