

Cohen, Dippell and Everist, P.C.

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
Second Periodic Review)
of the Commission's Rules) MB Docket No. 03-15
and Policies Affecting the)
Conversion to Digital Television)

REPLY COMMENTS

These reply comments are submitted on behalf of Cohen, Dippell and Everist, P.C. ("CDE") and are in response to certain issues raised in the various comments filed in the Notice of Proposed Rule Making ("NPRM") *In the Matter of the Second Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television* ("Periodic Review") at the Federal Communications Commission ("FCC").

CPB/WGBH National Center for Accessible Media ("NCAM") filed comments in support of Program and System Information Protocol ("PSIP"). CDE supports NCAM's comment requesting formal adoption of PSIP.

The Association for Maximum Service Television, Inc. and The National Association of Broadcasters urged the Commission to make an assessment of the transition's progress. CDE supports that review with the following in order to facilitate DTV transition.

- The Commission should establish a procedure whereby "simple" technical parameters which are obviously incorrect be permitted to be corrected by letter

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- Clarify the maximization standard to include the area calculation of the DTV largest station be calculated by its actual contour defined by the Longley-Rice prediction methodology service and OET Bulletin 69 as defined by Section 73.622(e) (net of terrain loss and before any interference calculation).
- Clarify the operation of a DTV transmitters and what system control and monitoring functions are required at the transmitter and the remote control site.
- The Commission should address those NTSC applications which are on file which prohibit DTV operations in the same community per MM Docket 87-268 from operating at full power.
- Class A out-of-the-core LPTV stations should be given special consideration at the end of the transition to permit operation on a returned channel.

Respectfully Submitted,

Donald G. Everist,
President

DATE: May 21, 2003