

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Interference Immunity Performance Specifications for Radio Receivers	)	ET Docket No. 03-65
	)	
Review of the Commission’s Rules and Policies Affecting the Conversion to Digital Television	)	MM Docket No. 00-39
	)	

**COMMENTS OF ZENITH ELECTRONICS CORPORATION**

Zenith Electronics Corporation (“Zenith”) hereby submits these comments in response to the Notice of Inquiry (“NOI”) issued in the above-captioned proceeding concerning, *inter alia*, the Commission’s development and implementation of minimum interference immunity performance specifications for broadcast digital television (“DTV”) receivers.<sup>1</sup>

As a primary developer of the U.S. DTV radio frequency (“RF”) transmission system and a leading provider of digital high-definition television (“HDTV”) equipment, Zenith has long been at the forefront in the effort to bring the benefits of digital television to all Americans. We are enthusiastic about the significant progress made in the digital transition to date, and we share the Commission’s strong resolve to ensure that the transition is completed not only swiftly, but in a manner that serves the best interests of all consumers.

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<sup>1</sup> See Interference Immunity Performance Specifications for Radio Receivers, ET Docket No. 03-65, Review of the Commission’s Rules and Policies Affecting the Conversion to Digital Television, MM Docket No. 00-39, Notice of Inquiry (“NOI”), FCC 03-54 (rel. Mar. 24, 2003).

Zenith commends the FCC for initiating this proceeding which includes consideration as to what, if any, actions need be taken to ensure that the performance quality of DTV receivers remains at a high level consistent with the needs and expectations of consumers. As the Commission is aware, however, spurring consumer interest in digital television is a multi-industry effort, and we are fully committed to working with our retailers, as well as our colleagues in the consumer electronics and broadcast industries, to encourage consumers to make the leap to digital television.

These comments focus specifically on the Commission's inquiries regarding the proposed development of voluntary industry performance guidelines for digital receivers utilizing the ATSC 8-VSB transmission system.<sup>2</sup> Even without such guidelines, competitive forces have been driving further performance improvements. For example, in Zenith's continuing quest to develop DTV receivers with ever-increasing performance, we are now completing the development of our fifth generation of digital receivers. We have also developed an enhancement to the ATSC standard called Enhanced VSB ("E-VSB") that will provide broadcasters more flexibility in their digital transmissions for additional robustness and receivability.

That being said, however, we believe it wise and prudent for the Commission to encourage the development of voluntary industry guidelines because mandatory receiver performance standards, whether imposed by the government or the industry itself, are difficult to monitor, test and enforce. We believe the excellent work within the Advanced Television Systems Committee ("ATSC") towards receiver guidelines – the ATSC calls these "Recommended Practices" – is the best solution. Building on Zenith's long-

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<sup>2</sup> See NOI at ¶¶34-36.

standing leadership role in the ATSC beginning with the development of the digital emission standard codified by the Commission, we have also been working within the ATSC's T3/S10 Specialist Group on Receivers, urging the group to move ahead on a process to establish voluntary receiver performance guidelines.

The RF environment is a complex and difficult environment never completely understood. The spatial, temporal and seasonal characterization of VHF or UHF channels is always changing. The challenges resulting from the more efficient use of the spectrum, both during and after the transition to all digital broadcasting, are different than those associated with analog-only broadcasting, but nevertheless surmountable.

While the benefits of digital transmissions are beginning to be well understood, there are also unique challenges within the digital realm. A healthy exchange between the participants in the ATSC S10 group is under way. Considerable data has been generated by the plethora of tests conducted by various members of the television industry, both DTV broadcasters and manufacturers alike. The establishment and analysis of that data is ongoing, all toward the goals of better understanding the reception environment, communicating that environment to receiver designers, and implementing appropriate designs by receiver and integrated circuit manufacturers.

In conclusion, we at Zenith pledge our continuing support of the ATSC's voluntary receiver performance guideline activity and believe that an end-of-the-year goal for the recommended practice is both realistic and achievable. And we trust that the Commission recognizes the ATSC's inter-industry initiative as responsive to its goal for voluntary receiver performance guidelines.

Respectfully submitted,

**ZENITH ELECTRONICS  
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