Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
	)	
Second Periodic Review of the	)	MB Docket No. 03-15
Commission's Rules and Policies	)	
Affecting the Conversion	)	RM 9832
To Digital Television	)	
	)	
Public Interest Obligations of TV	)	MM Docket No. 99-360
Broadcast Licensees	)	
	)	
Children's Television Obligations of	)	MM Docket No. 00-167
Digital Television Broadcasters	)	
	)	
Standardized and Enhanced Disclosure	)	MM Docket No. 00-168
Requirements for Television Broadcast	)	
Licensee Public Interest Obligations	)	

INFORMAL COMMENTS OF FIREWEED COMMUNICATIONS LLC

February 5, 2004

Fireweed Communications LLC (FWC) is the licensee of KYES-(TV) and several low power and one class A television stations in South Central Alaska. We hereby submit this as a late filed informal comment. Over the last year FWC has obtained STA authorization for DTV service in Anchorage Alaska. FWC was the first to broadcast DTV in Anchorage, and today remains one of two signals in the market, the other also being a lower power STA.

FWC is a financially challenged company which also has to contend with zoning and site problems. For example, FWC had provisions in its 1996 analog lease for DTV, yet the site owner obstructed construction of DTV facilities. In 2001 FWC encouraged construction of a nearby tower but the permit was not issued until December of 2003, and that decision has since been appealed by the owner of our companies analog site.

Nevertheless, FWC was able to construct and place on the air the markets first DTV signal. We now submit this comment in light of our recent experience.

DTV/Analog In-Core Channel Swaps

We favor in-core channel modulation swapping between a licensees digital and analog operations without resorting to a change in the table of allotments where it can be shown such a swap will not increase interference to other stations. Swaps will minimize interruption to over the air viewers, and will be easy and inexpensive to accomplish.

Simulcast

Only two DTV signals are on the air in Anchorage. Our station, KYES-DT transmits HDNET 1080 line programs 24 hours per day. The other station simulcasts their analog home shopping and PAX network programs converted from NTSC composite video to digital, and nothing else. Our market is in the earliest stage of transition to digital.

Present technology does not allow broadcast of 18 megabit per second high quality HD, as supplied by HDNET, and standard definition simulcast at the same time. KYES-DT must choose one or the other. KYES is a UPN affiliate. Although UPN now transmits 4 hours of HD programs weekly, Viacom, the owner of UPN, sends HD at 45 megabits in 4:2:2 format. Re-encoding UPN-HD for broadcast requires an HD encoder, which Fireweed cannot afford.

HDNET transmits at about 18 megabits per second in ready to broadcast 4:2:0. It is very inexpensive to pass through ready to broadcast HDNET.

Continued broadcast of HD programs by KYES-DT will help speed transition. For example, We have been told our HD signal is an important part of sales presentations at Shimik's, a local HD-TV retailer. If we simulcast our analog on KYES-DT retailers would be denied a sales point.

A simulcast requirement retards transition, and serves no useful purpose.

Distributed Transmission Technologies (DTS)

The Commission seeks comment on the effect of primary DTS service on secondary LPTV stations. We believe DTS transmitters should be allowed within the former predicted grade B analog contour without regard to interference to other stations, full service or secondary, and without prior FCC approval so long as certain criteria are met.

1. The broadcaster must submit to the FCC all technical information such as ERP, location, HAMSL, etc. prior to commencing transmission.
2. The DTS facility must not have greater field strength beyond the previous analog grade B contour than the DTV service field strength for its band.

For example, a UHF DTS facility should not be allowed a predicted field strength greater than 39 dBu outside of its 41 dBu contour.

3. DTS signals should be protected from interference using the same d/u ratios and percent of population receiving interference already established.
4. How important are distributed transmission systems likely to be in facilitating the transition to DTV? Very important. At the present time KYES has incomplete analog coverage within its analog grade B using four transmitters, all on different channels. DTS promises to allow delivery of much better signal strength to more viewers without use of one central transmitter with greater spectrum efficiency.
5. DTS can, and should be allowed to use polarization isolation to improve effective signal penetration and interference isolation.
6. Use of DTS should be permissive; in other words DTS should be allowed with minimal technical or regulatory requirements until broadcasters have built some record on the matter.

PSIP

Our company can not yet afford compliant PSIP. If PSIP were required, we would have to request a waiver, or go off the air. Market incentives will compel us to use PSIP. Prices for digital broadcast equipment will continue to fall, eventually placing PSIP within reach of FWC. At the moment, in our market, there are virtually no viewers, so use of PSIP hardly important. All viewers we know of who have tried to receive our transmission have had good results even though we do not transmit PSIP.

KYES-DT does transmit a DVB transport system table, which includes elements of PSIP. We also transmit a 320 by 480 low definition station ID slide with high quality music at a 600 kb/s rate. All viewers we have asked have reported being able to see this program in spite of no PSIP.

We feel PSIP should not be required, but if broadcast it the station should comply with standards set by ATSC. The marketplace will adequately prompt stations to broadcast PSIP.

CLOSED CAPTIONS

As with PSIP, our company cannot yet afford to provide closed captions, as it cannot afford to purchase a DTV encoder. However, two already obsolete encoders were give to our firm. These units will make it possible for KYES to simulcast, or to originate programming on KYES-DT. Unfortunately, the encoders do not provide for closed captions. As with all things digital, it will not be long before excellent encoders with closed caption capability are available at discount or used on E-bay.

KYES broadcasts HDNET, which does not include closed captions in its transmission. If it did, our equipment passes through whatever is sent by the network.

KYES-DT is one of two DTV signals that can be received in Anchorage, and the only signal in the state of Alaska with high definition content. Here, in the 157th market, DTV is in its earliest stages of transition. Therefore, we ask the Commission to release from the closed caption requirement for all small market stations until the end of transition.

STATION IDENTIFICATION

PSIP if broadcast, can include station identification. As we point out above, KYES-DT can not yet broadcast compliant PSIP. PSIP can include a call sign. Nothing more should be required when a station broadcasts PSIP.

KYES-DT can and does broadcast a low definition ID visual at 320 by 480 resolution on program two. It was only luck that brought us possession of an encoder that allows us to transmit station ID, especially as it does not yet simulcast its analog ID.

We suggest that the Commission require that DTV stations transmitting PSIP include their call sign as station identification, and that if broadcast, PSIP must comply with standards set by ATSC, but that any consideration of a requirement for PSIP or station identification be postponed for a future "Periodic Review."

I hereby certify that all of the statements of fact herein are true, complete and correct to be best of my knowledge and belief.

Respectfully Submitted and signed by:

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