

**SEPARATE STATEMENT OF
COMMISSIONER MICHAEL J. COPPS**

Re: *Digital Television Distributed System Technologies; MB Docket No. 05-312*

Anyone looking for an example of how the digital television transition would have benefited from a national commitment on the level of Y2K need look no further than this item approving the use of distributed transmission systems (DTS). The Order notes that DTS “will provide broadcasters with an important tool for providing optimum signal coverage for their viewers.” In particular, DTS can help provide service to viewers at risk of losing service due to challenging terrain or other factors such as the digital “gap” issue highlighted in the Wilmington test last September.

The problem is not the technology but the timing. Had we identified these coverage issues earlier, we could have approved DTS months ago and given broadcasters enough time to build out before the transition. Now that generally will not be possible. Would a truly comprehensive and coordinated DTV effort have identified these issues earlier? We will never know for sure. What we do know is that, in the absence of such an effort, we never gave ourselves a chance.