

**STATEMENT OF  
COMMISSIONER ROBERT M. McDOWELL**

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

By adopting rules that allow broadcasters to take advantage of Distributed Transmission System (“DTS”) technology, we hope to help consumers who may find themselves without over-the-air access to one or more of their favorite broadcast stations after February 17, 2009, the nation’s digital television transition deadline.

DTS is not a new concept. The technology relies on use of a series of transmitters located throughout a station’s authorized service area – rather than the traditional, centrally located single “stick” – to broadcast a digital television signal. Because of the flexibility provided by multiple transmitters, broadcasters who choose to make use of DTS will be able to reach viewers whose TV receivers might otherwise be blocked by terrain or other sources of interference. And because the multiple transmitters are technically capable of using the same frequency throughout the TV station’s service area, DTS makes more efficient use of spectrum than do the comparable analog TV booster stations (which must employ different frequencies to improve the main analog station’s reach).

Plainly, the new DTS rules can assist television broadcasters in overcoming the so-called “digital cliff” problem within their authorized DTV service areas, *i.e.*, the abrupt loss of the signal due to interference within the station’s service area. But our action today goes a step further to address a different concern highlighted by the early DTV transition in Wilmington, N.C. As our DTV call center’s data from September reflect, some viewers in the outer edges of the Wilmington region were unhappily surprised to learn that one local station’s authorized DTV service area is notably smaller than its old analog service area. In response to that situation, our Report and Order allows licensees to seek a waiver, during a limited window of time, to apply for DTS facilities that would extend the station’s digital signal out to the old analog Grade B contour. I hope that this limited waiver mechanism will help over-the-air viewers in more distant locations to continue to receive broadcast programming that they have long enjoyed.

I note, however, that nothing in our decision today *requires* broadcasters to make use of DTS technology – and even those licensees who are interested in it are unlikely to be able to construct DTS facilities before February 17. I therefore renew my call to broadcasters to work diligently, starting now, to inform their viewers about any technical issues that may affect over-the-air reception in their communities. In particular, I urge stations in each market to consider jointly producing and airing a local “infomercial” about how their viewers should prepare for the DTV transition. Such locally focused programs, especially if they feature engaging on-air personalities, could be an ideal, user-friendly way to convey important information about specific technical issues confronting a community, such as digital cliff problems or a station’s smaller DTV service area. A local infomercial also could greatly assist consumers grappling with tasks that people in many markets may confront, including converter box connections and antenna positioning. It is past time for DTV education efforts to move from generalized messaging to targeted assistance for consumers.