

**STATEMENT OF
COMMISSIONER JESSICA ROSENWORCEL**

Re: *Amendment of Section 73.3555(e) of the Commission's Rules, National Television Multiple Ownership Rule*, MB Docket No. 13-236.

The mechanics of this rulemaking may seem complex, but the underlying purpose is simple. Time advances, technology changes, and this agency must update its policies and rules.

Remember 1985? In 1985, broadband was a pipe dream. Dial up meant making a call on a phone—a hefty thing that was attached to the wall. Wireless handsets were the stuff of science fiction. Computing power on your desk probably involved a Commodore. A Walkman with a tape cassette was the portable way to listen to your tunes. On television, we watched *Dallas*, *Dynasty*, and *Miami Vice*. By any measure, it was a long time ago.

In 1985, the Commission first put its Ultra-High Frequency (UHF) discount for television in place. It was a product of the analog world. At the time, it compensated for the technical shortcomings of UHF signals used by television stations allocated to channels above 13. In the analog era, UHF stations had weaker propagation, limiting audience size. Their signals simply did not travel as far as Very-High Frequency (VHF) band signals allocated to channels 13 and below. As a result, it was the low VHF stations that were most desirable—because their signals reached the most viewers. To reflect the more limited scope of UHF signals and their less desirable status in the marketplace, they counted only half as much for the purposes of our television ownership rules. By all accounts, this was a fair approach to analog technology.

However, all of our full-power television stations have now converted to digital technology. The analog era is over. This is the digital age. With respect to UHF and VHF signals, this means the world is now upside down. The very UHF signals that had the least reach in analog broadcasting have the furthest reach in digital broadcasting. Conversely, the once-desirable VHF signals now have the weakest reach in digital broadcasting. We should here, as elsewhere, update our policies, to reflect current technologies. Our rules should not be grounded in technical constraints that no longer exist. That is what this rulemaking is all about.

Still, as we proceed, we must be practical about the impact on the marketplace today. That is important. I look forward to the record that develops and thank the Media Bureau for their hard work.