



Canadian Association of Broadcasters
Association canadienne des radiodiffuseurs

21 October 2009

Via Email: dadourian.jack@ic.gc.ca

Mr. Jack Dadourian
Manager, Broadcast and Multimedia-Terrestrial
Broadcast Engineering Branch
Industry Canada
300 Slater St
Ottawa ON K1A 0C8

Dear Mr. Dadourian:

Re: Canada Gazette Notice SMBR-001-09; Broadcast Procedures and Rules, Part 10 - *New Provisional Broadcasting Procedures and Rules Regarding Digital Television (DTV) Undertakings.*

1. The Canadian Association of Broadcasters (CAB) - the national voice of Canada's private broadcasters, representing the vast majority of Canadian programming services, including private television and radio stations, networks and specialty, pay and pay-per-view television services - is pleased to submit the following comments in response to Canada Gazette Notice SMBR-001-09.
2. The CAB has a keen interest in the development of application procedures relating to over-the-air (OTA) DTV transmitters. Many of our TV members will be among the licensees applying to operate such undertakings, as part of this industry's conversion to digital program delivery. For several years, the Association and some of its individual member companies have been consulting with the Department, via the Broadcast Technical Advisory Committee (BTAC), on the various technical issues related to post-transition OTA DTV operations. Broadcasters are pleased that Broadcast Procedures and Rules, Part 10 (BPR-10) has now been issued.
3. Inevitably, there will be sections in BPR-10 that will require changes, once more experience has been gained in Canada regarding the operation of transmitters carrying ATSC digital signals. This refining process may take several years. However, since there is an urgent need to proceed with the processing of DTV transmitter applications, the CAB considers that the provisional version that has now been published is sufficiently complete to allow it to be used by broadcasters and their engineering consultants in the preparation of technical applications for post-transition OTA DTV transmitters, wherever these may be proposed.

4. Nevertheless, there is one section of BPR-10 that the CAB believes requires modification, or at least clarification by the Department, sooner rather than later. Section B-1.12 (“Digital Grade B” or Coverage Contour) currently states, *“Determination of the appropriate field strength value to define “Digital Grade B” and characterize coverage of digital television is under development.”*
5. This wording implies that a future DTV service contour will be required, in addition to the Noise Limited Bounding (NLB) contour, described in Section B-1.5, and the DTV Urban contour, described in Section B-1.7. The NLB contour generally encompasses each station’s protected service area and depicts the geographic area where OTA DTV reception should be possible in 50% of potential viewer locations, at least 90% of the time. Presumably, any future Digital Grade B contour would represent a higher level of reception probability – perhaps 90% of locations, 90% of the time - and would therefore lie somewhere between the NLB and DTV Urban contours.
6. Private broadcasters consider that the later addition of a third service contour would be confusing for all concerned, including broadcasters, the regulators, the BDUs and program rights-holders. Under the current analog regime, two contours (Grade A and Grade B) are employed to depict OTA service areas. Were another DTV contour added, there is a concern that comparisons would inevitably be made between the analog Grade B and the Digital Grade B contours. Expectations might be raised that these should always be geographically coincident, given the similarity in the nomenclature. In many cases, achieving contour coincidence would require higher DTV operating parameters than might be reasonable to expect of broadcasters and may have only marginal benefit for viewers, most of whom receive signals via BDUs in any event.
7. As it happens, the analog Grade B contour is not a particularly good indicator of highly reliable OTA service either, since it is also based on a location probability of 50% and a time probability of 90%. There are areas within many analog Grade B contours where reliable OTA reception is impossible and yet this contour has been employed for over 50 years as the primary service indicator for TV coverage in North America.
8. In our view it is preferable to conduct any service comparisons between analog and digital services by using equivalent time and location probabilities. We believe that “official” coverage contour maps do not necessarily need to denote areas where highly reliable OTA reception is possible. Few viewers ever refer to contour maps when searching for local TV services. Advertisers and sales representatives tend to rely more on audience survey data than coverage maps. Broadcasters proposing service improvements or extensions are more likely to employ sophisticated, terrain-sensitive computer software instead of official contour maps in determining what changes are needed to meet their business objectives.
9. At present, transmitter contour maps appear to be used primarily for regulatory purposes. Even this may fade away as technological changes prompt the need for other means of describing broadcasters’ licensed areas, especially where conventional OTA transmitters are no longer used for programming delivery purposes.

10. Finally, we note that Industry Canada and CRTC staff have advised the CAB recently that circumstances may have changed between the time when BPR-10 was originally drafted and its release. Specifically, there may no longer be a need for a new DTV Grade B contour, especially considering the issue of technological change noted in the previous paragraph.
11. For all the above reasons, the CAB recommends that Industry Canada immediately release Version 2 of the provisional BPR-10, with Section B-1.12 removed. If this cannot be done quickly, then the Department is asked to at least indicate to all stakeholders in some other manner that it will not be developing criteria for a Digital Grade B contour.
12. All of which is respectfully submitted this 21st day of October 2009.

Sincerely yours,

Originally signed by:

Pierre-Louis Smith
Vice-President, Policy and Chief Regulatory Officer

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