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Merrill Weiss Group LLC

Consultants in Electronic Media Technology / Management

May 12, 2014

Mr. Hossein Hashemzadeh, Deputy Division Chief
Video Division, Media Bureau
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Dear Mr. Hashemzadeh:

I am writing on behalf of Family Broadcasting Group, Inc., licensee of Station KSBI, Oklahoma City, OK, to request a permanent change in the Station's assigned TSID value. KSBI currently is licensed on Channel 51 in File Number BLCDT-20090611AAE. KSBI was granted a construction permit to move to Channel 23 in File Number BPCDT-20140220ACB. The purpose of the channel change is to accommodate operation on Channel 52 in the Oklahoma City market by United States Cellular Corporation, which acquired at auction spectrum including Channel 52.

The request for a permanent change in the TSID value is based on the need for KSBI to transition from Channel 51 to Channel 23 with as little inconvenience to viewers as possible. It is clear that viewers will have to rescan their television sets to add the new Channel 23 to those channels that already are in memory, in any program guide that is displayed, and in the channel sequence when stepping through available channels. Since a single station will be changing channels without a general change of channels by all stations in the market, it is planned that KSBI will simulcast on its old channel (Channel 51) and new channel (Channel 23) for a brief period of time to provide instructions to viewers to rescan their sets. It is clear that each channel will require a separate TSID value during the simulcast period, as using the same TSID value on both channels would lead to an uncertain outcome in terms of what is stored in the tuning tables of receiver tuners and quite likely result in loss of service to some viewers.

The current plan is to use on Channel 23 the TSID value that originally was assigned to KSBI to identify its analog operation, TSID 2356. So as not to cause viewers to lose the signal on Channel 51, which will carry instructions to rescan TV sets and converter boxes, the currently assigned digital TSID value, TSID 2357, will continue to be transmitted on that channel. This will assure that the TSID values used by KSBI are not in use by any other stations in proximity to KSBI. TSID values have no inherent meaning and are used by television receivers in

combination with the physical channels on which they are found to help identify where receivers need to tune when viewers select services that are carried on the channels with which they are associated. Television receivers treat TSID values as unique identifiers of physical channels and only require that they not be duplicated among the signals that can be received by any particular receiver.

Once viewers have caused their receivers to rescan, it is important that they not have to do so again. If the currently-assigned digital TSID value, TSID 2357, were moved from Channel 51 to Channel 23 after the simulcast period ended and Channel 51 was turned off, a second rescan would be required immediately, but there would be no way to notify viewers to cause such a rescan to be performed by their receivers. It would be possible to advise viewers of the need for such a rescan prior to turning off Channel 51, but the result certainly would be loss of service to those viewers who did not remember to do so. It also would be a further inconvenience and additional expenditure of time for all of KSBI's viewers.

The result of these considerations is that the best and easiest solution to the matter is to avoid completely the need for a second rescan by simply having the KSBI operation on Channel 23 continue operation using the currently assigned analog TSID value, TSID 2356, on a permanent basis. From a technical standpoint, television receivers will work with the analog TSID value, TSID 2356, perfectly after one rescan. From an administrative standpoint, the only effort required of the FCC will be entry of the analog TSID value into the CDBS database entry for KSBI in place of its current digital TSID value. There will be no need for the Commission staff to identify a new TSID value for KSBI.

To reach these conclusions, I have consulted with two colleagues who are considered experts in the area of the Program and System Information Protocol (PSIP) and other service signaling in which the TSID value is carried, as defined in ATSC Standard A/65, as incorporated into the FCC Rules by reference in §73.682(d) and §73.8000. Those experts are Dr. Richard Chernock, Chief Science Officer of Triveni Digital, and formerly chairman of ATSC Technology Group 1 (TG1), which oversees the work on A/65 and related standards (and currently chairman of ATSC Technology Group 3 on ATSC 3.0), and Mark Eyer, Director of the Technology Standards Office of Sony, longtime chairman of ATSC TG1/S8, which wrote and maintains A/65 and related standards, and author of PSIP: Program and System Information Protocol, McGraw Hill, 2003.

It should be noted that the sort of channel change about to be carried out by KSBI is likely to occur frequently during the period after a spectrum repack by the Commission. Because of the presumed need for many stations to transition between channels and the sequencing of such changes that will be necessary due to the lack of additional spectrum to use for interim operations, it seems likely that stations will have to transition one at a time. If they are to do so with a minimum of inconvenience and loss of service to their viewers, a similar sort of TSID

value transition as that proposed for KSBI will have to be followed. Thus, the KSBI channel change can serve as a model for similar changes to come on a much wider scale.

The simulcast operations by KSBI on Channel 23 and Channel 51 currently are planned to start on May 22. The Station will begin an advertising campaign to alert the public of the coming channel change in the next few days. Thus, it is important that we know quickly whether the approach proposed in this letter is acceptable to the FCC. Please advise KSBI through me whether the permanent change in the assigned digital TSID for KSBI from TSID 2357 to TSID 2356 will be authorized and, assuming that you will make the change, what form of notification you will need in order to update the CDBS database to reflect the new TSID value.

Thank you for your assistance in making this aspect of the KSBI channel change a smooth one.

Sincerely yours,

A handwritten signature in black ink that reads "S. Merrill Weiss". The signature is written in a cursive style with a large initial "S" and a clear "Weiss" at the end.

S. Merrill Weiss

cc: Kevin Harding, FCC
Vince Orza, KSBI
Jerry Hart, KSBI
Erin Kim, Lerman Senter
Brian Madden, Lerman Senter