

July 16, 1992

Concurring Statement of Commissioner James H. Quello

**In re: Advanced Television Systems and Their Impact upon
the Existing Television Broadcast Service (MM
Docket No. 87-268)**

The significance of this item is its "first draft" Table of Allotment for ATV. This draft Table is based on the proposed objective of having all ATV allotments in the UHF band. I do not support the proposed objective of an all UHF ATV allotment. As the Commission stated earlier in this proceeding, licensees should have the flexibility of providing ATV service on their original 6 MHz or on the newly allotted 6 MHz assuming such flexibility was feasible within their markets. Proposing all ATV service be on the UHF band does not take into consideration the effects on VHF station value and service areas vis-a-vis UHF stations. I recognize that the VHF band cannot accommodate all ATV allotments, however, to propose to relegate ATV solely to the UHF band is unnecessarily premature.

Furthermore, I have difficulty with the proposed objective of determining that allotments should favor the maximization of ATV over the opportunity of matching ATV contours with current NTSC contours. In my opinion, the preferred objective should be to leave the options open at this time on whether to base allotments on matching service contours or maximization of ATV service. I am cognizant of industry efforts to develop such an allotment plan, and hopefully the industry's plan will be submitted during the course of this proceeding.

###