

January 13, 1983

Concurring Statement of FCC Commissioner James H. Quello

In re: Amendment of Part 2 of the rules to simplify the equipment authorization procedures; Amendment of the regulations to expand the notification and verification equipment authorization procedures.

I am concurring in the result of this action because of my concern with the proposals to de-emphasize the Commission's traditional oversight over two pieces of equipment which are integral parts of our broadcasting system; i. e., television receivers and antenna phase monitors.

Antenna phase monitors are devices which provide information on the relative phase of current directed to each tower in an AM radio directional antenna array. The relative phase and current ratios determine the shape and direction of the signal pattern which emanates from such an array. While I realize that the monitor is only one part of a system that produces the phase information to the licensee, it is the only part which this Commission can easily control.

Television receivers manufactured under current practices are not likely to cause significant interference problems and, therefore, it might be appropriate to place more reliance upon the manufacturers than we have in the past. However, I want to make it very clear that my concern regarding television receivers -- and particularly UHF television receivers -- is not limited to their interference potential. Recognizing that they are a vital part of our television broadcasting system, I remain concerned with their performance. As is noted in the Notice of Proposed Rulemaking adopted today, manufacturers must still submit annual reports on UHF noise figure performance for Commission review. They also will continue to be subject to both the All Channel Receiver Act<sup>1/</sup> and our rules relating to receiver performance. My concerns are further assuaged by the Commission pledge to sample receivers after they have reached the marketplace to determine whether, in fact, they meet those requirements.

While I have these concerns, I am concurring because this Notice will provide the opportunity to gather and thoroughly evaluate all comments in response to these proposals.

<sup>1/</sup> PL 87-529, July 10, 1962; 76 Stat 150; 47 USC § 303(s)