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NATIONAL ASSOCIATION OF EDUCATIONAL BROADCASTERS

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THE NAEB UHF ASSIGNMENT PLAN

Early in November the NAEB submitted informally to the FCC, the results of its computer generated UHF Assignment Table.* The report included the rationale for the development of the plan and a nationwide Table of Assignments which listed all operating and CP facilities as well as those additional channels which were assigned by the computer.

Although the NAEB recommended to the FCC that it adopt the plan included in the report, it suggested as an intermediate step that the FCC issue the NAEB plan as an alternate to its own proposal which had been released about two weeks earlier. This is the first time that such a plan, developed largely in consultation with FCC engineers and according to all pertinent rules and regulations, was available to be considered as an alternate solution to the problem of television channel allocation. With both plans issued for comments, the NAEB suggested, interested parties would have an opportunity not just to indicate their reaction to one plan, but to express a preference for one plan or another.

The FCC staff has studied the NAEB proposal carefully and has requested that certain additional analyses and summaries of the computer assignment be prepared for further study. These materials were submitted and it now appears there is a very good chance that the FCC will issue the NAEB plan as an alternate proposal to its own Table, thereby enabling comments to be filed directly concerning the NAEB Assignment Plan. If this is done, the Commission will probably also extend the date for filing comments from January 3, 1964, to the first part of March.

WHO SHOULD BE CONCERNED

It is easy to think of problems of television channel allocations as a technical matter which might well be left to engineers. True, these matters are technical in nature, but the impact of expeditious technical decisions on the future growth of all forms of broadcasting is a measure of the importance which educators themselves must place on this particular proceeding. Any organization which has already had an opportunity to confront commercial interests who oppose the reservation of a given television channel realizes the importance of preserving now the educational requirements for television channels which can reasonably be predicted for the future. There are a number of instances where such reservations were not made in the past, and each one demonstrates the wisdom of developing an assignment plan which considers at this time long range educational needs, even though they may not be fully matured for the next several years.

*If you have not received copies of the complete NAEB report, they are available from the Washington office and will be sent upon request.

DIFFERENCES BETWEEN THE FCC AND NAEB PLANS

It is perhaps useful at this point to consider some of the differences between the assignment plan proposed by the FCC and the one proposed by the NAEB. We wish to emphasize first, that we have not looked upon the NAEB plan as a "rival" to the FCC's proposal. We have considered it from the very beginning as a different approach using more efficient computer techniques and providing a different background concerning the value of educational reservations. Inasmuch as many institutions may wish to comment on one plan or the other, it would be helpful to keep the following things in mind.

Concerning educational reservations, the FCC's plan has sought to satisfy needs which have been identified by the NAEB spectrum study and existing state plans for educational television development. The NAEB plan has taken a broader view and supplemented the requirements identified in those sources with an extensive study of population growth patterns and educational needs which have not yet been formalized into an official plan for state-wide development. The NAEB plan provides just over 1000 reservations (VHF + UHF) and the FCC plan provides about 700 (VHF + UHF). Of particular importance has been the NAEB's effort to provide multiple channels in large metropolitan areas where developing educational and municipal needs could never be satisfied by one or even two channels.

Concerning the distribution of channels, the FCC plan has sought to distribute assignments rather evenly across the 70 UHF channels, and the NAEB procedures resulted in greater use of low UHF frequencies. While the advantage of low UHF frequencies is probably a temporary one, it is important to make an efficient distribution of these frequencies at this point while they are particularly useful.

Concerning the methods used for determining the Table of Assignments, the FCC staff, which has had to use manual calculations, has been particularly interested in the NAEB approach which used an electronic digital computer. The computer approach is valuable not only for the development of the nationwide assignment table, but it is perhaps even more valuable because of the additional calculations which can be made to solve a variety of problems which may occur from time to time. A good example, cited in the NAEB Report, indicated that the problem of finding replacement channels for Channel 37 after it was deleted from the Table took only a few hours, and there was assurance that a variety of potential alternatives could be fully explored. In the solution of a problem such as this using manual procedures, the tendency is to settle for the first solution one is able to make rather than choosing the best solution from a variety of available considerations.

As a final note, we should like to point out that comments concerning either the FCC's Table or the NAEB's Table should, insofar as it is possible, be made on the basis of the overall plan. It is difficult, we realize, to overlook the fact that a particular channel which had been considered as "belonging" to a given location may no longer be there. But careful consideration may have shown that in terms of the nationwide allocations pattern, moving one channel made it possible to satisfy needs in three or four other communities.

In the full report of this study, we emphasized that it is vital that any assignment plan, at this stage of its proceedings, be considered as a new beginning rather than a new ending. What we will have after these deliberations have been concluded is a new and better base from which to operate. It is our feeling that while the FCC's proposed plan is a significant improvement over the existing Table of Assignments, the NAEB's suggestion enables us to go several steps further in identifying the availability of television channel assignments and in reserving them for a variety of educational and community needs.

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