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80. Comments of Proponents of STV. Comments received are summarized in this and the succeeding paragraphs 28/ and are followed by our conclusions. Zenith and Teco, incorporating by reference previously submitted material, state that audience siphoning would be minimal because the average subscriber at Hartford had an STV viewing time of approximately 2 hours per week as compared to the average U.S. free TV viewing of about 38 hours per week. This is about 5% of the hours the public now views free TV. If every home were to become an STV home, which is unlikely, there would thus be a loss of 5% of viewing time to STV. But if 10% penetration of STV were achieved, the loss would be $\frac{1}{2}$ of 1%. Moreover, since even in prime time between 35 and 50 percent of TV homes do not use their sets, some of those viewing STV might be those whose sets would otherwise have been dark so that their viewing would be additive rather than subtractive. They also demonstrate the minimal audience siphoning effect by stating that the average STV audience at any particular time was 5.5% of the subscribers. Thus even if there were 100% penetration by STV, only 5.5% of the subscribers would be diverted at any given time, leaving 94.5% of TV homes available to watch free TV.

81. Concerning pre-empting of time now used by free TV, it is stated that WHCT at Hartford broadcasts an average of 30 hours per week of subscription programming and that, because of the limitation on the number of box-office programs and the size of the recreational budget of families, that number is unlikely to vary in other STV operations. 29/ Since typical TV stations broadcast about 115 or 120 hours per week, in a multiple-station market of three or more stations STV could not absorb more than 10% to 15% of the total broadcast time available. Moreover, it is argued, because conventional TV stations affiliated with networks probably would not wish to desert profitable operations by giving up network programming for STV programming, it is likely that STV will have to support the establishment of new stations if it is to get off the ground. New stations would not siphon time that would otherwise be available to free TV. They would add to the total amount of time.

82. As to program siphoning, Zenith and Teco inform us that none of the programs shown at Hartford were available on free TV. With regard to talent siphoning, they remind us that stars, producers, directors, and writers often work for more than one medium and there is no more reason to assume that STV will siphon talent than there is to suppose that the motion picture industry would do so, since for much of its programming STV merely would substitute

28/ Many of the arguments made in the comments have been previously made in earlier stages of this proceeding.

29/ Zenith and Teco state that because of these limitations a total of about 30 hours of STV programming is all that can be absorbed in any market regardless of the number of STV stations therein.