

Before the
FEDERAL COMMUNICATIONS COMMISSION

Washington, D. C. 20554

In the Matter of
Amendment of Part 73 of the
Commission's Rules and Regulations
(Radio Broadcast Services) to provide
for Subscription Television Services
For Action by the Commission

Docket No. 11279

**COMMENTS OF INTERNATIONAL TELEMETER
CORPORATION**

International Telemeter Corporation (hereinafter Telemeter), by its attorneys, respectfully submits the following comments in response to the Commission's Further Notice of Proposed Rule Making and Notice of Inquiry in Docket No. 11279, released March 24, 1966.

I. SUMMARY OF TELEMETER'S CONCLUSIONS

1. Telemeter's principal conclusions, as developed herein, are as follows:

A. Telemeter Has Developed the Equipment and Has the Experience To Implement a Successful Subscription Television Service.

2. On the basis of sixteen years of development and five years of experimental operation, International Telemeter Corporation has developed a subscription television system permitting maximum operating flexibility. The system may be operated on a cash or credit basis, over-the-air or via coaxial cables, and in color or black and white. It is low in cost and compatible with television stereophonic sound. The Telemeter broadcast decoder functions as a UHF converter on free programs. It converts VHF only receivers to all-channel receivers.