

**Before the
U.S. DEPARTMENT OF COMMERCE
NATIONAL TELECOMMUNICATIONS AND INFORMATION ADMINISTRATION
Washington, D.C. 20230**

In the Matter of)
)
Low-Power Television and Translator)
Upgrade Program)
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**COMMENTS OF
BELO CORP.**

Belo Corp. (“Belo”), by its counsel, is pleased to submit these comments regarding NTIA’s implementation of the low-power television and translator upgrade program.¹ Belo is the parent company of entities that own a number of full-power television stations, low-power television (LPTV) stations, and TV translators. Belo is also a part of Rural Oregon Wireless Television, Inc., a non-profit organization which holds a number of LPTV and TV translator licenses in Oregon that are used by local broadcasters, including Belo, to rebroadcast to areas that do not receive television service due to mountainous terrain. Finally, a number of LPTV and TV translator stations owned by small rural operators rebroadcast several full-power Belo stations. Collectively, these stations serve as a lifeline to rural areas that are unserved and underserved by full-power stations. Many of these stations are licensed to non-profit organizations, operated by a small number of volunteers on a shoe-string budget. These stations lack the resources to convert from analog to digital. Their sole purpose is to ensure that rural areas receive television broadcast service. Belo recognizes the vital role that these stations perform and strongly supports this program to help rural low-power stations convert to digital.

¹ See Title III of the Deficit Reduction Act of 2005, Public Law No. 109-171, 120 Stat. 4, 21 (Feb. 8, 2006).

This program will help to ensure that people in rural areas who receive the majority of their television service from low-power stations are not left in the dark as the rest of the country converts to digital.

For the same reason (*i.e.*, lack of resources) that it is not feasible for the vast majority of low-power stations to make the transition to digital on their own, NTIA must ensure that the conversion program is as simple and streamlined as possible. If it is not, many of these rural, low-power stations will not participate and the purpose of the program will be frustrated. These stations are only concerned with providing their communities with important television service. These stations are not designed to be profit centers and they do not have the resources to hire outside engineers and attorneys. Rather, they rely on volunteers from the local communities to operate. If the process to obtain funds for conversion to digital is complicated, prohibitively expensive, or time consuming, many of the stations that would otherwise be eligible may forego participation to the detriment of the public that relies on these stations for service.

As one example, NTIA seeks comment on what methodology should be used to determine if a station serves 20,000 or fewer persons and is thus “rural” and eligible for the NTIA conversion program. Belo submits that NTIA should choose the simplest and least expensive method: the population of a station’s community of license based on census data. This number is easy to determine, requires little work from stations, and would be easy for NTIA to verify. If, on the other hand, the definition of “rural” is based on a station’s contour, stations would need to hire consulting engineers to prepare such studies. This would add an unnecessary cost to the program and could prohibit stations from participating.

The rules adopted by NTIA should also allow stations to receive the money upfront and should cover all eligible stations' costs to convert (*i.e.*, no cap on the reimbursement). The vast majority of these stations do not have money set aside for capital costs and could not raise money to cover the expenses to convert to digital. If NTIA does not provide stations money *before* they convert to digital, they will be less likely to make the change due to lack of funds. Further, if stations are not assured that they will be fully reimbursed for the costs necessary to convert to digital, the grant would be useless because many stations would not be able to pay for the remainder of the conversion costs.

In conclusion, Belo wholly supports the purpose of this program. The grants will greatly assist rural low-power stations that lack the resources to convert to digital which will result in continued television service to rural areas unserved and underserved by full-power stations. However, Belo encourages NTIA to develop a simple and streamlined program so that rural stations do not face unnecessary barriers to obtaining grants.

Respectfully submitted,

BELO CORP.

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