

NTIA/PTFP Second round Translator funding cycle Suggestions

2. Eligible Low-Power TV Facilities

“(1) that is itself broadcasting exclusively in analog format” *Is itself broadcasting*

Have license, CP, or program test authority?

Exclusively in analog format

What date? **June 30 2007**

Reason, Most of us have started to in some form to convert our translators if nothing else apply for flash cut licenses.

Any licensed LPTV or Translator that is on the air, or has a CP on the date that the legislation was passed should be eligible... Some may not yet have a CP, and may be short of funds to do the engineering needed.. The NTIA funds should be useable for flash cut applications too.

February 8, 2006 (date of legislation), date
NTIA announces the Upgrade Program; date
application is submitted, another date?

Many small community organizations run on very tight budgets with little capital to spend, even if reimbursement is provided. Perhaps a stepped approach with grant money furnished in steps such that the small organization need only come up with the money for the first conversion. After that, the NTIA funds would be in effect “seed” money for the rest as conversion is accomplished.

3. Reimbursement for Equipment

Reimbursement for Equipment

“Equipment to upgrade low-power television stations from analog to digital”

What costs or equipment should be eligible?

It really depends on how much money and how many are applying for that money, It would be nice if all cost would be covered, but that would raise the costs for each application and would probably make so that some would not get a grant at all because you were covering all the cost.

You could make it where you only cover 25% of the instillation and 50% of the hard costs.

For us in Public broadcasting it is not as hard to raise monies for projects but if you are a small organization and do not have the experience or the man power it would be very difficult.

Transmitters, antennas, other equipment?

Planning costs? **No** Installation costs? **That would be the next to go, most organizations can get volunteer labor to install translators.**

Retrofit, modify or replace existing equipment? **Yes, lots of translators are not that old, modification is very efficient use of funds the only problem is the government can not have a lean on the equipment.**

Should there be a formula or limit (cap) on the amount of funds awarded to a single station? **That is a tough one some of ours are just a strict translator others have towers and antenna changes. I would put a cap for sub categories such as \$5K for antennas \$15K for translators, sometimes if you think you have unlimited funds you have a tendency to get the more expensive rather than being concrete.**

If so, what should the cap be based on? **On reasonable costs of a normal system, again the cap should not be total but if you are applying for antenna there should be a cap on the sub group**
Original license or CP power level formula. A 1kW TPO analog station should be eligible for more funds than a 100 watt TPO station...

How much should the cap be? **No more than \$50K**

What date should NTIA establish as the date after which applicants can start spending money that may be reimbursed by the Upgrade Program?
At least Jan 08

4. Eligible Rural Communities

“Eligible rural communities, as that term is defined in section 610(b)(2) of the Rural Electrification Act of 1937 (7 U.S.C. 950bb(b)(2)).” *“any area of the United States that is not contained in an incorporated city or town with a population in excess of 20,000 inhabitants.”* 7 U.S.C. 950bb(b)(2).

Possible Interpretations :

Community of license <20,000 Approx: 5019 Facilities Eligible (based upon 2000 census)

Possible Interpretations:

Community of license <20,000

Clearly, this is the only practical way to determine eligibility... Population counts for Grade B service area are easy to generate or have prepared.

Service area (Grade B contour) <20,000

Service area (Grade A contour) <20,000

Approx: 4349 Facilities
(based upon NTIA propagation study with 2000 census)

Possible Interpretations:

Community of license <20,000

Service area (FCC contours) <20,000

No metro area >20,000 in Grade B

Rural areas outside of metro with < 20,000 population If the population is less than 20,000 in the Grade A (B) contour List to be posted on web When area includes a metro of more than 20,000, possibilities include:

Subtract out areas of more than 20,000

Coverage cuts through urban area— look at RUS formula more than 50%; 55%; or 60% to be eligible?

This is a real problem for some of our translators. If you go by RUS strictly only about 15% qualify and then you can still not qualify because of school lunch program, You should go by city of license, vary the % depending on the population maybe %75/25% for 10,000 or less, \$50/50% for 20,000 or less. It is harder to raise funds in the smaller populations areas.

Perhaps rurality formula to be competitive? **Give priority to 10,000 or less, Fund those first. Fund the rest with what is left over. Maybe have a plan that you could resubmit for more funds if there are any left over.**

5. Priority reimbursement

“Priority reimbursements shall be given to eligible low-power television stations in which the license is held by a non-profit corporation and eligible low- power television stations that serve rural areas of fewer than 10,000 viewers.”

How to define non-profit corporation?

501c3

Could governmental bodies qualify as non-profit corporations? **Only with a maximum cap, so there is a chance that the smaller groups can get funds.**

Population in Grade A contour <10,000?

Population in Grade B contour <10,000?

Same reasons as given above for <20,000.. Easy to determine...

Other possibilities?

City of license population

Should station meet both criteria to receive Priority?

- 1. Non profit**
- 2. Under 10K population**
- 3. Under 20K population**
- 4. Over 20K if funds are left over.**

How should Priority be awarded?

See above.

Special grant round for stations with Priority?

Many stations would qualify. Should be efficient for stations to apply

Is Web based application best? **Yes Yes Yes**

Must be efficient for NTIA to process

Make grant applications for groups not each translator so we could apply for multiple translators on one application. IT will not like it, so what is new.

Reimbursement

That sucks. But normal. Especially when you are small group.

Should station expend funds before application? **Yes, You can not get the grant started soon enough, handle like 3 year grant program, First year you could expend funds early.**

Can station expend funds after award and then receive reimbursement funds?

Yes,

How to Conduct the Program

How to determine how many stations qualify?

Pre qualify, make database of those that would need funds. Have a pre qualifying round.

Uniform Grants? **YES YES YES**

I would try to keep the program as uniform as possible.. Perhaps with a formula based on TPO needed, and/or checklist (menu) of equipment required to complete the conversion.

-First Come-First Served?

Yes.

Competitive Grant Program? ***NO, too complicated! Will delay the whole process.***

with point system

What evaluation criteria?

Submit suggestions to NTIA at:

lptv@ntia.doc.gov

