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Much has changed since the United States has recently suffered one of its greatest economic collapses since the Great Depression. Specifically, Low Power Broadcast Television Stations will be required to go to the great expense of converting from analog broadcasting to digital broadcasting. This will happen at a time when advertisers are leaving; TV stations are having to cut back in production and news staff; and some stations have been forced into bankruptcy because of this economic collapse.

Add to that the constriction on credit availability in an already tight marketplace; and there is a potential catastrophe in the making for Low Power Television. Many Low Powers are denied even basic cable carriage; let alone satellite carriage. Banks are already reluctant to lend to Low Powers because of this fact. Add to this the fact that this economic collapse has even caused banks to be reluctant to loan money to other banks; and there are serious problems on the horizon for LPTV to say the very least.

I would propose the following; which would be revenue neutral. In other words, this proposal would not cost the taxpayers or the government anything; but it could very much help to save Congress's creation of LPTV:

I would propose that each FCC Licensed Low Power; Class A; and Translator Broadcast Television Station be given a grant of \$150,000 (with proper oversight) to convert to digital broadcasting. This would be fully funded by a very small portion of the auction receipts that will be generated by the FCC as they reclaim and auction off the excess broadcast spectrum that will not be needed by the television stations when they begin to broadcast in digital.

I also submitted some comments last May that I would like included:

Thanks for being asked to submit suggestions on how the \$65,000,000 in NTIA funds should be disbursed!

First of all, please let me speak in generalities: I believe that inclusion rather than exclusion should be the order of the day. In other words, I would rather see all eligible stations get some money rather than a relative few number of stations get all their costs covered. What I am submitting here is because going to digital is so very expensive, I could very easily envision the entire \$65,000,000 being used up in only a small portion of all the eligible stations. As said earlier, I would rather see every eligible station get some help. Priority eligible stations would get more; and non priority eligible stations would get

less; but all would get some. You have many more happy campers with this type of an approach. I will get more specific in question number five, and also in my numeric example.

1. Which Low Power TV Facilities should be eligible?

"A currently broadcasting (analog) Translator, Low Power, or Class A TV Station who has not yet converted to digital."

2. What Type of FCC Authorization should the station have?

An FCC License. (I wouldn't think that "Construction Permits" and/or "test authority" would not be what the legislators intended here)

3. What date?

The most logical here seems to me to be the date of the legislation; February 6, 2006.

4. Reimbursement for Equipment; type?

Any equipment needed such as transmitters, encoders, modulators, PSIP generators, antennas and needed testing equipment should be reimbursed. I would personally like to see installation costs also reimbursed; but to be honest, I'm not sure those were in the minds of the legislators. Planning costs could be a potential can of worms. How are they substantiated? Both retrofitting and/or going with new equipment should be eligible.

5. Reimbursement for equipment: Inclusion or Exclusion?

As cited above, I vote for inclusion. I would take the total amount of money available to distribute, \$65,000,000, and divide it by the total number number of eligible stations. (NTIA has a very good estimate of this) This would result in an average grant per eligible station. I would then establish a formula by which to give the priority eligible station a multiplier; and to give the non priority eligible stations a lower multiplier. I would then multiply the average grant available for each station by the appropriate multiplier to establish the grant cap available for each station.

I would then establish a date by which applications needed to be made by. After that cut off date, any excess funds (if for instance the number of applications did not come up to the number of estimated eligible stations) could be distributed to the successful applicants.

(If any adjustment needed to be made if there more successful applications then the number of estimated eligible stations; that adjustment could also be done at that point)

Let me just do a very rough mathematical example:

Lets say NTIA estimated there were 3,000 eligible stations. 1,500 were priority eligible; and 1,500 were non priority eligible. I would divide \$65,000,000 by 3,000 to get \$21,667 which is the average grant per eligible station. I would give the priority eligible stations a 1.1 multiplier giving them a grant cap of \$23,834 each (representing the higher amount for the priority eligible stations level). I would give the non priority eligible stations a multiplier of .9 giving them grant cap of \$19,509 each (representing the lower amount for the non priority eligible stations level).

6: What date should NTIA establish to start spending the money?

Many stations will have many times when the funds are needed. Therefore, a starting date should be established shortly after the NTIA applications (Web based) with a finishing date when the Low Power Transition is completed.

7: What are eligible rural communities?

Eligible rural communities should be the communities of license as established by the FCC; using the 2,000 government population statistics put out by the Bureau of The Census. Metro areas should not be included as rural communities. Obviously, this would not be what the legislators intended. By the way, it should be noted that at least as I read the legislation, priority level only includes those stations who meet both criteria. They must serve a community of less then 10,000; and their FCC license must be held by a non-profit. As to whether governments should be used, I'm not sure governments are true non profits as defined by the IRS; but they certainly do not make a profit.

I believe this covers most of the areas that the NTIA was interested in. Please feel free to get in touch with me if you have any questions. Again, thanks so much for allowing me to have input into the process!