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You asked us, the LPTV stations owners to write you in regards to our needs for NTIA grant money distribution. I believe that we rural LPTV stations suffer the most from lack of advertising support and have to operate from our limited small town budget.

Here is my financial challenge: I am in the 43rd DMA, Las Vegas, Nevada. However, I am 60 miles northwest of Las Vegas in Pahrump. Pahrump is a small town with very little businesses to solicit for advertising. Our main source of advertisers are also small businesses. Our taxes, Insurance and employee costs are the same as anywhere else. This creates a tough working environment to work from. Here is why. We have an extremely hard time getting a Las Vegas business to advertise in Pahrump due to the ad agencies claiming their LV full power stations covers our area. (Truthfully, those full power signals are snowy and not worth watching. Our bigger challenges are Dish and DirecTV) So we have to depend on local advertisers. Home Depot, Wal-Mart, Smiths, Walgreens and Albertson's will not advertise because of the same above reasons. Before these larger businesses opened, we had more advertisers. However, many of the smaller businesses who advertised have been put out of business with the opening of the larger companies listed above.

With this said, we need help with financing the conversion. The heart of the cost is the Exciter, Transmitter, Encoder and Antenna. In my case, a 250 watt Larcen digital unit is \$47,000 plus antenna and installation. If we could have a percentage of this cost reimbursed that would help. I will have to lease this equipment plus new production and post production equipment to complete this conversion. Over 4 years I am looking at \$1600 a month or better.

I would like to see the \$65 million go to the broadcaster that are serving the rural community currently. Less funds for those who have to build 1st time stations. We are currently invested in the market and are being asked to completely rebuild our infrastructure. Those who have not built a facility yet are expecting the expense of building a station and that cost should fall on their shoulders. Translators are also in the same situation. Their owners have spent a first time investment and also should receive a percentage. However, I believe in most cases those translators are not true LPTV station operators but are larger broadcast companies able to fund their own build out. They would have to be reviewed as who is behind them, a small company or a full power broadcaster.

Anyway, whatever amount can be granted would help. I plan on doing my conversion asap.

Please look out for me and let me know how I can be helpful to your research in the future.

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George J. Molnar  
Vegas PBS  
Las Vegas, Nevada  
October 30, 2008

Thank you for the opportunity to comment on the NTIA LPTV and Translator DTV Upgrade/Conversion Program.

I would suggest the following:

- 1) Fixed level of funding based on the type of station being upgraded - Class A, LPTV or translator.
- 2) Funding available to stations with a valid analog station license or CP as of the date of legislation (2/8/06), provided that stations were not already broadcasting in digital before that date. Holding of a digital license, without operating DTV facilities, by an analog broadcaster should not be disqualifying. Grantees must demonstrate a valid digital license or permit upon grant.
- 3) Municipally or agency owned (school districts, etc.) facilities would be eligible, provided all other criteria are met.
- 4) Funding available to stations with a city of license reporting a population (US Census Bureau data) of 20,000 or less, operating in an area that is either a) in a designated "rural" county OR b) outside the effective coverage of the program-providing station (in the case of translators).
- 5) Applicant self-reporting is sufficient for #2 and #3. Verification must be available for audit, but to speed the process need not be submitted at the time of application.

- 6) Grants to be available on a per-station basis, regardless of number of stations owned by a group/association.
- 7) Priority grant window for non-profits and extremely rural (<10,000 population city of license and rural OR outside effective coverage area of a primary station) should open 30 days before the main window.
- 8) All grants on a first-come-first-served basis.
- 9) No specific equipment list is necessary, as each station will receive fixed funding and decide how best to apply it towards digital conversion.
- 10) Grant subject to recall after one year if Grantee does not demonstrate a functioning digital station.
- 11) Expenses may be incurred before Grant approval, and will remain the responsibility of the Grantee.
- 12) Application should be a one-page web-based form.