

This in response to NTIA request for comments on the digital upgrade program now under discussion.

I am engineering director and operator for 5 counties of Northeastern Colorado. Region 1 Translator System (Yuma, Phillips, and Sedgwick Counties), Logan County, and Washington County. Working in close cooperation, we currently operate 81 TV translators (74 analog and 7 digital). Outside of Utah it is one of the largest, if not the largest translator system, in the United States. Without this system there is no free over-the-air TV in this area that includes the major networks and PBS programming. This service has been provided for over 28 years.

We have been experimenting with conversion to digital for at least 3 years now and have found costs to be higher than envisioned. Conversion of our old analog transmitters can be made usually for near \$10,000.00 but the cost is much higher due to technical work involved. Conversion has been found to be unsatisfactory in most cases. It is like putting a rebuilt engine into a 15 year-old car that has 175,00 miles on it. Parts keep failing and many of the parts of the transmitter retained are no longer available. Most of our transmitters are more than 15 years old. While well maintained, replacement parts are increasingly difficult to find and, in some cases, no longer manufactured. Therefore, our digital transmitters now operating are all new equipment with one exception. It was a factory upgrade of a near-new analog transmitter DESIGNED capable of digital broadcasting. When the cost of new output filters, digital processor and other parts were added to factory rebuild costs, the total cost approached \$10,000.00 not including technical personnel instillation and related costs.

The Northeast Counties' TV system anticipates that the average cost of the remaining transmitters' conversion to digital to be more than 18,000..00 and could go as high as 21,000. Keep in mind that some licensees' sites will require combining filters and/or antennas, especially if channel changes are required, that may cost more than \$20,000.00. Of course, those costs can be divided between 3 or more transmitters on the same site. Nevertheless, that adds to the average cost of each transmitter conversion.

Like everyone else, the counties are strapped for money. We hope that the government can assist greatly in this forced endeavor to switch to digital TV broadcasting. The counties' system is financed by fixed mil levies or recreation funds for maintenance with little for capitol improvements. Therefore, our feeling is that \$10,000.00 as early proposed is the minimum per transmitter that will move us into digital slowly. Where new transmitters and especially channel changes are indicated, 15,000.00 to 20,000.00 would speedup the transition envisioned by the government.

NTIA funds are needed ASAP, as soon as the law allows. People with new TVs and set-top boxes are asking us for more digital now. We would like to see funds retroactive to at least November 2007.

We wish to thank the NTIA for the digital to analog grants received. Many of our stations are on-air with digital inputs now ahead of the February analog turn-off with greatly improved video. The grant cost paid for 2/3 to 3/4 of the cost of these conversions.

Respectfully,

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