



NATIONAL TRANSLATOR ASSOCIATION

Office of the President, 2355 Ranch Drive, Westminster, CO 80234 303-465-5742 fax 303-465-4067 stcl@comcast.net

November 17, 2008

Via e-mail lptv@ntia.doc.gov

LPTV Program
U. S. Department of Commerce
Room 4812
1401 Constitution Ave., NW
Washington, DC 20230

RE: Administering The Grant Program For Upgrading TV Translators To Digital Output In Accordance with PL 109-171, Section 3009 as amended.

The National Translator Association (NTA) wishes to offer a refinement to the suggestions, which were sent on September 29, 2008

In the previous communication we stated:

“It is necessary to strike a compromise between undue complexity and responsible stewardship of the federal funds in devising the application process...”

We believe it is the intent of PL109-171 to provide funds to assist LPTV stations and TV translators to provide digital television to rural areas. It would appear that the intent is met if the transmitted signal is in the standard digital 8VSB format whether the content is in standard definition or high definition. Accordingly the funding should be reserved for the transmission part of the station.¹

NTA previously suggested that grants in the \$4000.00 to \$6000.00 range with two categories within this range be made available with an application of minimal complexity.

¹It is certainly a desirable objective to have originating stations move towards supplying high definition program material. However, the program content is still entirely available to the public if it is transmitted in standard definition in the 8VSB digital format. Upgrading originating facilities and transportation equipment, such as ‘studio to transmitter links’, should not be a part of this program.

Dedicated to the improvement of over the air broadcast service to all United States residents through the maximum utilization of TV and FM Translators.

Page 2

We now propose to extend and refine these categories to include more complex and expensive conversions. We are working to develop ten to a dozen categories, which will include a variety of output frequency bands and power levels. Sub categories will be provided based on whether the transmitting antenna needs to be changed. Each category would have a standard dollar amount attached to it.

With the expanded list of categories most applications could be reduced to a certification that the necessary transmission equipment changes fall into the specified category.

An applicant who feels none of the categories fits his required changes should still be allowed to submit a detailed application to be considered on a case-by-case basis.

By establishing categories with the dollar amount pre-assigned, the application preparation burden is held to a minimum and the processing time at NTIA greatly reduced. The loss of the exact match between the cost and the reimbursement seems an acceptable compromise in return for the increased efficiency.

NTA is in cooperation with the relevant manufacturers and is preparing a suggested list of categories and associated reimbursement amounts.

It was not possible to finish the definition of the categories and assemble the cost before this writing, but we hope to have them available in time to be of use.

Sincerely,

A handwritten signature in black ink, appearing to read "Byron W. St. Clair". The signature is fluid and cursive, with a small mark at the end.

Byron W. St. Clair
President