

National Translator Association's major positions on the TV Band Incentive Auction

DON'T KILL TV! The NTA (National Translator Association) has distributed numerous letters to the offices of members of the Senate Telecommunications Committee and the House Telecommunications Subcommittee with most emphasis for the members from the states that are most benefitted by translators and that will suffer most from their loss. Over the past year, at least a half-dozen visits to DC have been made and these arguments delivered to members and their staffs, to newspapers in the affected districts via hundreds of press releases and to the DC press corps in a number of interviews and releases, together with cooperative efforts involving NAB, NRB, ATBA, PBS, APTS and the LPTV Spectrum Coalition. Some of our members have approached their representatives and their state broadcast associations.

Material published has generally been slanted toward "telling the story" by humanizing the dry facts. Our website describes an elderly couple in Nevada and our letters and appeals have taken the tone of such stories. Our first priority is directed at protecting our viewers! Here are the following big issues which have been, not in any particular order, the following:

FCC staff members in the Incentive Auction office and further, the FCC Chairman should have been honest with members of Congress and the press in their utterances regarding the effect of the auction on TV translators and LPTV stations. The simple statement that "They can always displace to a new channel" glosses over or does not reveal several key facts:

- (a) There will be a footrace among displaced entities for the extremely limited number of available displacement channels after the repacking.
- (b) The footrace will be "fixed" by the Commission with an arbitrary set of priority filings, slanted in favor of DRTs.
- (c) NOT A DOLLAR OF THE AUCTION MONEY WILL GO TO LPTV OR TRANSLATORS!

The cost of displacing and re-equipping the station accordingly is not covered and most (nonprofit) translator licensees cannot afford it. Both input and output channels are at risk! To see the effects of this disaster on translators, look at the diagram which follows. *The FCC must allow some priority in filing for displacement channels by rural TV translator/LPTV licensees or many communities will lose free TV service altogether.* These include communities that are too small, too dispersed, too remote or too poor to support cable systems or broadband distribution rollouts in the community or which have poor line of sight reception or limited satellite view vantage points. Such communities are the rural Native American reservations and towns and old agricultural and mining communities in rough terrain. Numerous such

communities are found in the Midwest and West, particularly. These communities contain a disproportionately large number of elderly, low income, minority and otherwise disadvantaged residents who will be unable to replace the lost free TV service that they have enjoyed for fifty years.

Funding for forced displacements for new channels and/or locations must become available to translator licensees or service will be lost. Such funding could resemble that previously offered by the Department of Commerce for the digital transition and is an insignificant amount of money - pennies on the dollar - based on FCC auction predictions.

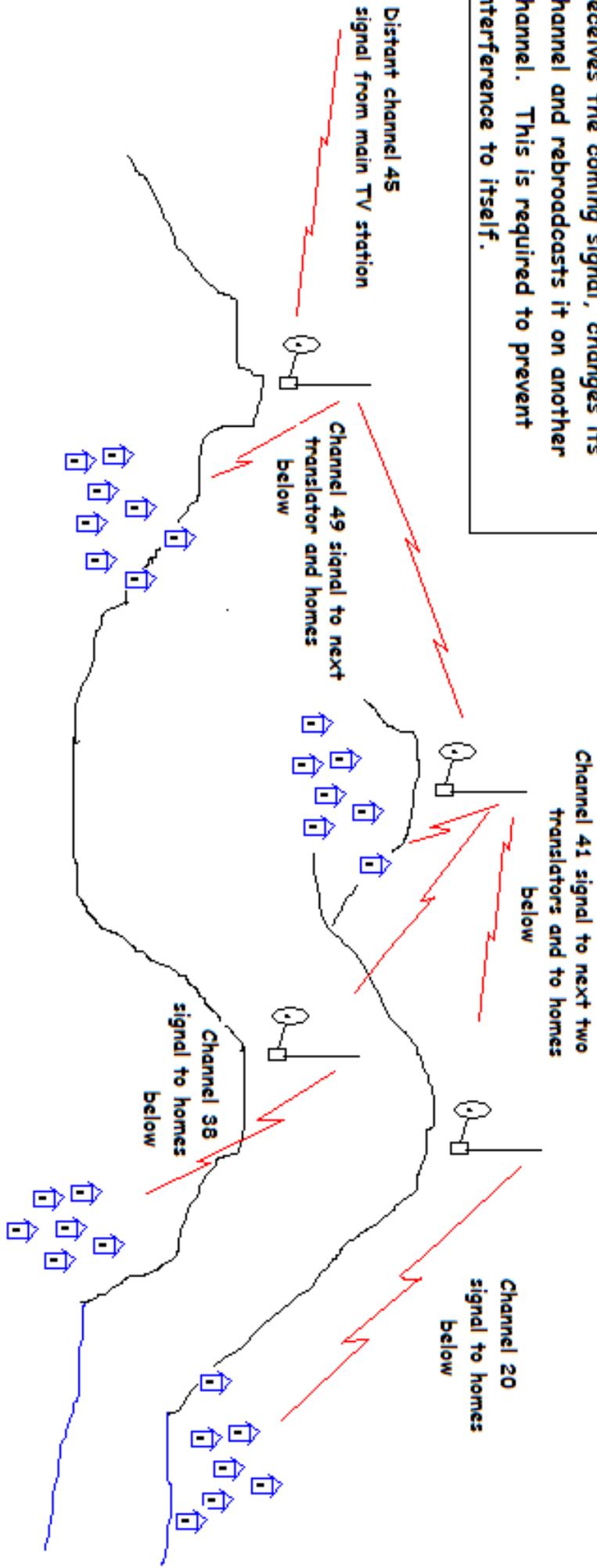
The start of the auction at the end of March did and does not bode well for either the broadband or the television industry. The AWS-3 auction was an example of available frequencies which were not taken from private licensees who needed them at the time of the auction. Auctioning these frequencies did not harm existing licensees or users. Our members have long espoused the theory that a similar frequency selection process to that used in the AWS-3 auction could occur to lessen the pressure on the 600 MHz band. If this auction proves to be a dud as Bloomberg and others have predicted, an entire industry and numerous (formerly) elected officials will live to regret it... along with millions of disadvantaged viewers.

“Why did you have to rush so, Chairman Wheeler?”

National Translator Association www.NationalTranslatorAssociation.org

FREE Save LPTV and Translator spots at www.DontKillTV.org

A translator system and how it works; each receives the coming signal, changes its channel and rebroadcasts it on another channel. This is required to prevent interference to itself.



Loss of channels 45 or 49 will kill TV in all four communities

Loss of channel 41 will kill TV in three communities

Loss of channels 20 or 38 will kill TV in one of the two on the right side of the sketch

Each  is a translator

These effects are due to the necessary daisy chain nature of translator broadcasting in rural and mountainous areas