

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC


In the Matter of:)
)
Amendments of Part 73 and 74 to Improve) MB Docket 19-193
the Low Power FM Radio Service Technical)
Rules)
)
Modernization of Media Regulation Initiative) MB Docket 17-105

COMMENTS IN SUPPORT OF ELIMINATING TV6 PROTECTION

1. Hope Christian Church of Marlton, Inc. is filing these comments in support of the proposed elimination of the Commission’s TV6 protection rules (47 CFR § 73.525) and (47 CFR § 74.1205) as proposed in the above-captioned proceedings.
2. Hope Christian Church of Marlton, Inc. is the licensee of several noncommercial educational FM (NCE) stations in the Philadelphia, PA, area currently impacted by the TV6 protection rules.
3. The TV6 protection rules date back several decades, to a time when TV transmission was analog under the NTSC specification. The exact protection ratios were determined with measurements of analog television receivers much less sophisticated than today’s receivers. Furthermore, most TV stations transitioned to digital in 2009, including the TV6 station in Philadelphia, PA. The old rules are not only out of date but are simply no longer relevant.
4. The new digital television standards simply do not require this protection. If they did, the Commission would not allow adjacent DTV channels to be used in the same market. The fact that this is allowed proves adjacent signal protection is no longer required.
5. The proposed sunset date of July 13, 2021 should not apply where the affected TV6 station has already transitioned to digital. Our stations have suffered for more than a decade due to inferior facilities because of these outdated TV6 protection rules. We suggest an NCE applicant for new or modified facilities where a TV6 station has transitioned to digital, would be entitled to an automatic waiver of 47 CFR § 73.525 and 47 CFR § 74.1205 prior to July 13, 2021.

6. We respectfully urge the Commission to eliminate both 47 CFR § 73.525 and 47 CFR § 74.1205 as both rules are out of date and no longer needed.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read 'W. C. Luebke, Jr.', written in a cursive style.

William C. Luebke, Jr., President
Hope Christian Church of Marlton, Inc.