



NATIONAL TRANSLATOR ASSOCIATION

OUR AIM - TO PROVIDE FM and TV SIGNALS in EVERY HOME

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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FCC MAIL ROOM

Secretary
Federal Communications Commission
1919 M. Street NW
Washington, DC 20554

RE: Reply Comments - MM Docket 87-268, Advanced Television

Dear Secretary:

The National Translator Association is the organization of TV and FM translator owners, operators and technical support people. We are dedicated to bringing free over-the-air TV to persons leaving outside the reach of a full complement of primary TV and FM signals.

We are writing in opposition to the requests made by Cornell University on behalf of the Arecibo Observatory for restrictions on the use of channels 36, 38, 52, 53, 54. While we do not have members in Puerto Rico we are sympathetic to the needs of all members of the public who live in areas where terrain makes television reception difficult.

The Technical Statement included as part of Cornell's request states (pg. 4, section IV.)

"...Puerto Rico has more than half of the TV broadcasting channels (34 out of 67 channels) already allotted. The small size of Puerto Rico does not permit frequency reuse and many existing facilities are extremely short-spaced."

Given the above statement and:

- 1) The need for every available TV channel brought on both by the growth in regular NTSC broadcasting and the needs of the ATV allotments, neither of which was a factor in the dim past when channel 37 was reserved for radio astronomy.
- 2) The need to provide an ATV channel for all regular TV stations.
- 3) The urgency to keep existing translators operating (including going to displacement channels in some instances).

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

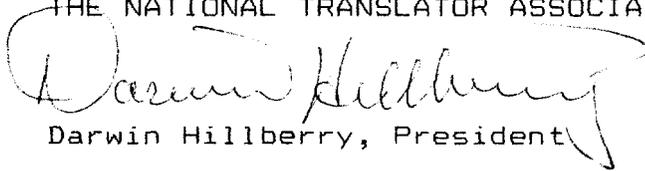
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4) The requirement, unaddressed so far, of spectrum space for new translators rebroadcasting ATV stations, which surely will be necessary in the simulcast time if rural residents are not to be left out of the transition process.

The National Translator Association submits the public interest does not permit additional restrictions on channel usage to protect radio astronomy facilities especially in a congested area such as Puerto Rico, rather the Commission should be considering whether the public interest allows the continues reservation of channel 37 for one special purpose of interest to a very limited group of people.

Very truly yours,
THE NATIONAL TRANSLATOR ASSOCIATION


Darwin Hillberry, President

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