

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	MB Docket No. 18-214
LPTV, TV Translator, and FM Broadcast)	
Station Reimbursement)	
)	
Public Notice Seeking Comment on Catalog of)	MB Docket No. 16-306
Potentially Reimbursable Costs Incurred by)	
Low Power Television, Television Translator)	
and FM Broadcast Stations)	
)	
Expanding the Economic and Innovation)	GN Docket No. 12-268
Opportunities of Spectrum Through Incentive)	
Auctions)	

To: The Commission

COMMENTS ON PUBLIC NOTICE

Mohave County Board of Supervisors (the “County”), by its counsel, hereby submits its Comments on the Public Notice: Catalog of Potentially Reimbursable Costs Incurred by Low Power Television, Television Translator and FM Broadcast Stations (DA 18-1072) in the above-captioned matter.

As the Commission’s records reflect, the County previously has submitted filings on the importance of reimbursement for certain microwave relay stations necessary to maintain the continued delivery of distant, full-service television programming provided by County translators.¹ In particular, the County has noted that, due to repeated displacements/loss of translator channels occasioned by changes in Commission policies, the County has not been able

¹ See ex parte letter from William K. Keane, counsel for the County, to Marlene S. Dortch, Secretary, dated July 24, 2018; and Comments on Notice of Proposed Rulemaking filed September 25, 2018, in MB Docket No. 18-214 and GN Docket 12-268.

to identify interference-free channels for two of its 18 translators subject to displacement; those two translators must be fed by microwave relays.² The County proposes to modify existing microwave relays (WPOQ863 and 864; WPOQ882 and 884) so as to specify new channels that would be used to feed the two translators.³

The County has reviewed the draft Cost Catalog and is of the view that, with one clarification, it appears to adequately capture the reimbursement eligibility of TV Intercity Relays (“ICRs”) like the County’s, as well as the likely range of costs associated therewith.⁴ The clarification relates to the line item for “Frequency Coordination (per license – 2 needed for bi-directional link).” (Section II. F). In the County’s experience, frequency coordinators often break out 'Frequency Coordination' into two parts, one for the coordination, and one for interference analysis. Accordingly, the County suggests that the item be re-worded to state: “Frequency Coordination and Interference Analysis (per license - 2 needed for bi-directional link).”

² The County operates a total of 48 television translators serving residents in this very sparsely populated area of Western Arizona, an area which includes the Grand Canyon.

³ The County notes that the National Translator Association has supported reimbursement for costs, like the County’s, that would be reasonably incurred to continue to receive the input signal of TV translators. Comments at pages 9-10. In particular, “NTA agrees with the comments of Mojave [sic] County Board of Supervisors, that STL links and other related means of interconnecting a source with a translator should be eligible for reimbursement.” Reply Comments at page 3; *see also* Comments at pages 9-10.

⁴ The County’s earlier filings (see note 1) provide further details supporting the County’s conclusions; those materials are hereby incorporated by reference.

Conclusion

Reimbursement for the County's microwave relays will preserve television service for the remote, sparsely populated communities in the County given the latest re-packing of the UHF band. The Cost Catalog's proposals appear consistent with that objective.

Respectfully submitted,

/s/ William K. Keane

William K. Keane
Its Counsel

November 20, 2018