

**Before the  
Federal Communications Commission  
Washington, DC 20554**

Incentive Auction Task Force and Media Bureau Seek Comment on Catalog of Potentially Reimbursable Costs Incurred by Low Power Television, Television Translator and FM Broadcast Stations

MB Docket No. 18-214

MB Docket No. 16-306

GN Docket No. 12-268

**Comments of Missouri Southern State University**

**Introduction**

Missouri Southern State University (MSSU), which is located in Joplin, Missouri, serves nearly 6,000 students in more than 140 academic programs. MSSU is part of state university system in Missouri, and its athletes participate in NCAA Division II athletic programs.

MSSU operates a low power digital television (LPTV) station, KGCS-TV, which has served the Joplin region for more than 30 years. Joplin is a community of over 50,000 individuals in Southwest Missouri in Jasper County. Its metropolitan area also stretches into Newton County, and both counties are served by KGCS.

KGCS is owned by the Board of Governors at Missouri Southern State University. The station provides training opportunities for students in the Department of Communication. It also provides programs of interest to the campus and community. KGCS programming may be seen over the air on digital broadcast, reaching more than 168,000 households in the region. KGCS can also be seen on the regional cable television system, and its website is [mssu.edu/kgcs](http://mssu.edu/kgcs). KGCS has a strong community focus to its programming, which goes beyond the important MSSU-related events that they also cover. For example, KGCS has programming which, among other things, focuses on the following: local Joplin municipal and county government meetings and hearings; weather emergency information; local sports events; and other newsworthy events in the city of Joplin and the surrounding area.

## Comments

MSSU is appreciative of the opportunity to provide comments on the proposed catalog of potentially reimbursable costs that are incurred by LPTV stations. This proposed catalog was released by the Federal Communications Commission (FCC) on October 22, 2018 as part of a Public Notice on this matter. Our comment is a follow-up to the earlier comment made by MSSU on the broader issue of reimbursement of LPTV costs on October 26, 2018.

MSSU is supportive of the inclusion of the below costs referenced in Roman Numeral II of the attached Appendix A in the catalog of potential expenses:

### Transmitters and Ancillary Costs

1. Minor Rechanneling Issues
2. New Transmitters
3. Other Transmitter Expenses

### Transmission Line

### Tower Related Costs

### Professional Services

### Other Potential Costs (including FCC filing fees and Point to Point Microwave)

It is important to note that on May 31, 2018, MSSU submitted a “Displacement for LPTV Station Application” for KGCS. This matter is pending before the FCC. As part of this process, MSSU has seen firsthand the costs of making such an application. In light of this application experience, MSSU feels that it would be helpful to discuss five categories of costs that they anticipate as part of their LPTV displacement experience. MSSU would like to have these types of costs be included in the catalog of potential reimbursable costs.

- I. Planning and Preparation
- II. Project Management
- III. Implementation of Project (including equipment purchases as needed)
- IV. Communication-related Costs
- V. Economic Impact

### Planning and Preparation

MSSU, as part of its Displacement for LPTV Station Application, has incurred significant costs in planning and preparation. For example, these costs include engineering and legal-related costs to plan and prepare for this displacement process. MSSU has to spend dollars for both engineering and legal services attempting to obtain the channel we requested, both in regard to the original application as well as in resolving a potential MX matter. These approximate costs could range from \$10,000 to \$15,000.

### Project Management

MSSU, as part of its Displacement for LPTV Station Application, had to dedicate significant time of a few particular individuals on their workforce on this matter. For example, our station general manager and chief operator have had to dedicate work time to manage this displacement matter, which could have been dedicated to other matters. Furthermore, as part of this project management, MSSU will also need to get all relevant construction permits as needed. These approximate costs could be up to \$50,000 of in-kind employee contributions and permitting costs.

### Implementation of Project (including equipment purchases as needed)

MSSU, as part of its Displacement for LPTV Station Application, could have significant equipment purchase and/or equipment repair costs. Examples of the equipment costs could include the following: new mask filter to the output of the transmitter; retuning the antenna; and either retuning the existing transmitter or potentially purchasing a new transmitter as needed. If a new transmitter is required, we understand that costs will be considerably higher. It is our understanding that no work on the transmission line is required.

It is important to note that there are costs of a crew to install the relevant equipment by climbing the tower, and labor costs in areas such as Joplin, Missouri are significant. These labor costs to repair and/or to install the new necessary equipment can be significant. When you combine the costs of the equipment with the installation, the total implementation costs of this displacement project could be up to \$200,000.

### Communication-related Costs

MSSU, as part of its Displacement for LPTV Station Application, is going to incur significant communication costs regarding their change in LPTV channel. MSSU LPTV consumers need to be notified of the channel change. This notification will need to be accomplished through the following, among other methods: public notice; billboards; mailing fliers; and other educational

means necessary to educate the consumer public. These communication/public relations related costs could be up to \$25,000.

### Economic Impact

MSSU, as part of its Displacement for LPTV Station Application, is going to incur a negative economic impact of having to change its LPTV station. In the short term, during the transition to the new channel, we expect a loss of viewers as individuals learn that we are on new channel. It is hard to quantify this loss of viewers, but it will have some economic impact on the health of the station. There is a regulatory burden put on the station to change channels. This economic impact cannot be quantified at this point, but should be considered by the FCC when cataloging reimbursement expenses.

With these costs in mind as discussed below, the estimated total cost to LPTV stations owned by educational institutions, like MSSU, for this displacement process could total up to \$290,000, which does not count the intangible economic impact costs referenced above.

Lastly, it is important to point out that MSSU, like other state universities that run LPTV stations across the country, is supported by taxpayer funds. Public universities and colleges are always under fiscal pressures, and many of them are not able to afford an LPTV station. MSSU is fortunate to have an over 30-year tradition of LPTV production, which serves the Joplin and Southwest Missouri region. In order to help maintain this important tradition going forward, the sufficient reimbursement of displacement costs by the Federal government would help reduce the budgetary pressure that universities that operate LPTV stations are facing. Furthermore, as a relatively small public university in primarily rural Southwest Missouri, we want to make sure that any FCC reimbursement system does not discriminate against institutions such as ours. We believe that the reimbursement system should be fair and equitable in its treatment of all types of television stations, which includes LPTV stations.

### **Conclusion**

We support the efforts of the U.S. Congress and the FCC to address the equity of reimbursement of displacement costs. It is our hope that the aforementioned expenses of LPTV displacement can be included in the final catalog of reimbursable expenses. The inclusion of these expenses will help KGCS continue to operate and serve the community of Joplin and our region in southwest Missouri. We thank you for this opportunity to submit these comments.