**Before the**

**Federal Communications Commission**

**Washington, DC 20554**

In the Matter of )

)

Expanding Flexible Use of the ) GN Docket No. 18-122

3.7 to 4.2 GHz Band )

**REPLY COMMENTS OF THE NATIONAL TRANSLATOR ASSOCIATION**

The National Translator Association (NTA) is a non-profit membership and advocacy organization dedicated to assuring the delivery of free over-the-air television to every household in the United States. Television translators serve a vital role in all regions of the United States, and NTA has membership in all regions of the country, but with a concentration of members in the states of the Inter-Mountain West and the Pacific Coast, where terrain and historical factors have led to extensive use of translators to deliver television signals to isolated rural areas – an essential delivery mechanism that continues to this day.

NTA's paramount concern is in the preservation of TV translator delivery of free over-

the-air television signals, especially to homes that may have no alternate source and stand to lose

all television service if TV translator service is impaired or terminated. Low Power Television

(LPTV), a service that was grafted onto TV translators in 1982, is a dynamic means of delivery

for new and original program streams; has an important role in urban and especially in small,

isolated communities in rural areas; and measures to protect this service, too, should be given

priority.

Television translators and LPTV stations cannot meet the obligation of delivering

free over-the-air television content if they cannot receive that content to rebroadcast. The

primary reception method for both TV translators and LPTV stations is via C-band

satellite reception. Any adverse impact on the ability of stations to receive C-band content

distribution is an adverse impact on the delivery of free over-the-air television.

In its Comments filed May 31, 2018, in this proceeding, NTA expressed concern that the

Commission did not have all the facts necessary to assess the impact of an allocation decision

affecting existing users of the 3.7 to 4.2 GHz band. Information supplied by other participants

in this proceeding have borne out that concern. C-band content reception is used by over a

thousand full-service Television Network stations (NAB Comments in this proceeding),

thousands of MVPD head-ends (NCTA Comments in this proceeding), 475 Public Radio

stations (National Public Radio Comments in this proceeding), thousands of TV Translators and

Low Power Television stations, and countless Independent Television Stations and Commercial

Radio stations. Registration of receive-only C-band earth stations has always been voluntary and

most users have not registered. When the Commission initiated this proposal, there were around

4,700 C-band earth stations registered with the Commission. Now there are over 16,500 C-band

stations registered. Before the Commission proceeds with reallocation or sharing it needs to

identify current users and to consider how best to protect existing critical content distribution

mechanisms. In addition, all current users need to have the flexibility to change locations in the

future. This proceeding is not designed to elicit sufficient facts to provide the bases of an

informed decision.

2

The Commission has auctions planned for later in the spring to allocate broadband

frequencies. The instant proceeding should be held in abeyance until there is a demonstrated

need for more broadband spectrum. Also, the Commission must reserve sufficient spectrum for

future video and audio distribution.

NTA fully supports the Comments filed by the National Association of Broadcasters in this proceeding.

Respectfully submitted,

NATIONAL TRANSLATOR ASSOCIATION

6868 Vivian Street

Arvada, CO 80004

(801)393-0012

By: /s/ George R. Borsari, Jr.

John Terrill, President

George R. Borsari, Jr., General Counsel

December 10, 2018

3