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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

November 22, 1996

VIA HAND DELIVERY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Re: Advanced Television Systems and Their Impact upon the Existing Television Broadcast Service
MM Docket No. 87-268
Comments

Dear Mr. Caton:

Channel 6, Inc., through counsel, hereby files the original and five copies of its comments to the Sixth Further Notice of Proposed Rule Making in MM Docket No. 87-268. Please contact the undersigned if you have any questions.

Sincerely,

Ann K. Ford
Michael Ruger

Enclosures

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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of	)	
	)	
Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service	)	MM Docket No. 87-268

To: The Commission

COMMENTS

1. Channel 6, Inc., licensee of KCEN-TV, Channel 6, Temple, Texas, and television translator Station K63DL, Bryan, Texas, hereby files these Comments in response to the Commission's Sixth Further Notice of Proposed Rule Making (FCC 96-207, released August 14, 1996) ("Sixth NPRM"). Channel 6, Inc., is concerned that unless safeguards are adopted to protect translators and LPTV stations, individuals living in rural areas are at risk of losing free, over-the-air service as a result of channel modifications arising from the implementation of DTV.

Discussion

2. Both the Commission and the Broadcasters' Modified DTV Table, which will be filed in conjunction with the joint comments of broadcast television stations and networks, propose Channel 40 as the DTV channel for KCEN-TV. Channel 6, Inc., does not object to this proposed allotment, provided that no changes are made to either channel plan which would result in increased interference to KCEN-TV, and notes that both channel plans serve the public

interest by accommodating all full-power television channels in the Waco-Temple, Texas, ADI.

3. Channel 6, Inc., is concerned that individuals in rural areas risk losing over-the-air broadcast service from facilities such as its translator Station K63DL as a result of the move towards digital television.[1] Station K63DL provides network programming to the residents in and around Bryan and College Station, Texas. Without the translator, Station KCEN-TV's signal would not reach these communities, depriving residents of this programming service. Station K63DL also provides much-needed local news, weather and emergency information to the Bryan-College Station area. Weather information is especially valuable to local residents, as the area served by this translator is frequently the location of sudden and severe storms.

4. Assuming the Commission adopts a DTV channel allotment plan which does not preclude the use of Channel 63 in the Temple-Waco area, Station K63DL will ultimately be displaced if the Commission adopts its "core spectrum" plan. Unless a replacement channel in the "core spectrum" band can be found, the translator would be forced off the air. Even if a new channel could be found, Channel 6, Inc., would incur significant expense in moving its translator to a new channel.

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[1]Under the DTV allotment plans proposed by the Commission and in the joint comments of broadcast television stations and networks, Station K63DL would not have to modify its current operation. There is no assurance, however, that either plan will ultimately be adopted.

Conclusions

5. As the continued operation of translators serves the public interest, Channel 6, Inc., supports various Commission proposals which would afford some level of protection to LPTV and translator stations, and would ease the transition to digital television. Specifically, Channel 6, Inc., supports the adoption of rules which would permit the continued operation of a translator or LPTV station until a displacing DTV station or a new primary service provider is operational, and which would permit continued operation on channels outside the "core spectrum" area so long as operation does not interfere with any full service DTV or NTSC station. See Sixth NPRM at ¶¶ 68-69. Furthermore, if the "core spectrum" approach is adopted, the Commission should reserve frequencies between Channels 52 and 59 for use by displaced LPTV stations and translators. See Sixth Notice at 70. To further protect translators and LPTV stations, the Commission should adopt its proposal to permit translator and LPTV station licensees to seek primary use of available DTV channels ahead of new applicants for broadcast stations. Sixth NPRM at ¶ 72.

6. Finally, Channel 6, Inc., supports the Commission's proposal to require new spectrum users to compensate LPTV and translator licensees for their move to another channel (if a channel is available) or for the value of their existing investment. See Sixth NPRM at ¶ 69. Compensation will ease the

transition to new channels and will help to ensure the continued operation of LPTV and translator service.

Respectfully submitted,

Ann K. Ford
Michael Ruger

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Filed: November 22, 1996