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Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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

TO: The Commission

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SUPPLEMENTAL COMMENTS OF THE TRINITY BROADCASTING NETWORK ON THE SIXTH FURTHER NOTICE OF PROPOSED RULEMAKING

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Date: November 22, 1996

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TO: The Commission

SUPPLEMENTAL COMMENTS OF THE TRINITY BROADCASTING NETWORK ON THE SIXTH FURTHER NOTICE OF PROPOSED RULEMAKING

These supplemental comments are filed on behalf of the Trinity Broadcasting Network and its affiliated organizations (collectively "TBN" or "Trinity") in connection with the Commission's Sixth Further Notice of Proposed Rulemaking (MM Docket No. 87-268, FCC 96-207, released August 14, 1996) ("Sixth Notice").[1] TBN is the licensee of 200 television translator stations throughout the United States and holds construction permits to build an additional 22 translators.[2]. While TBN is participating as a signatory on the industry comments being submitted in the name of "Broadcasters' Comments on the Sixth Notice of Proposed Rulemaking," because it is the largest non-governmental operator of television translator facilities in the country, it will be uniquely and detrimentally impacted it the Commission's proposals

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[1] The participating licensee organizations in these Supplemental Comments are: Trinity Christian Center of Santa Ana, Inc., d/b/a Trinity Broadcasting Network; Trinity Broadcasting of Florida, Inc.; Trinity Broadcasting of Arizona, Inc; Trinity Broadcasting of Indiana, Inc.; Trinity Broadcasting of Oklahoma City, Inc.; Trinity Broadcasting of New York, Inc.; Trinity Broadcasting of Texas, Inc.; and Trinity Broadcasting of Washington.

[2] See Attachment to Exhibit A, Engineering Statement of Kevin Fisher.

specified in the Sixth Notice are followed without change. It is, therefore, submitting these limited comments as a supplement to address the unique impact implementation of DTV will have on television translator and LPTV service throughout the country.

I. The Core-Channel Bias Will Result in Gigantic Losses of Free Television Service Provided by Translators and LPTV Facilities

1. In the Fourth Further Notice of Proposed Rulemaking and Third Notice of Inquiry, 10 FCC 10541 (1995), the Commission stated that one of its primary goals in implementing DTV was to preserve a free, universal broadcasting service. In the Sixth Notice (at 10) the Commission repeated that the "primary goal of this proceeding is to ensure that the implementation of the DTV service is accomplished in a manner that serves the public interest." Without question providing a universal, free television service, and protecting viewers from the loss of free service, must remain the governing principles guiding the Commission.[3] In the area of television translators and low power service, however, this cardinal principal is being abandoned.

2. As explained in greater detail in the attached engineering statement, the Sixth Notice's proposal to create a core-channel band (channels 7 through 52), and the reclaiming of channels 2 through 6, and channels 52 through 69, would result in the loss of service to more than 41,847,000 people now covered by TBN translator stations alone. Such a staggering loss of service has not been justified, and strongly speaks against adoption of the core-channel proposal.

3. Of the 200 operating facilities held by TBN nearly half, 98 facilities, would either cause or receive devastating levels of interference under the proposed DTV implementation. The

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[3] Historically, the Commission and Congress have always recognized the overriding public interest of providing the widest possible broadcast service, and guarding against the loss of service. See, for example, The All Channel Receiver Act, Pub. Law No. 87-529, 76 Stat. 150 (protected viewers from loosing free television service through the deintermixture policy).

number of people in the present coverage area of these affected facilities is 26,500,282. An additional 54 TBN translator stations would be forced off the air with the reclaiming of channels 52 through 69. These stations provide a predicted service to 24,663,388[4]/ viewers throughout the United States.

4. All of TBN's translator facilities provide a diverse and unique program service--inspirational, religious and family oriented programming. To allow the loss of even small amounts of free service has long been held contrary to the public interest. New Jersey Public Broadcasting Authority, 74 F.C.C.2d 602, 605 (1979) (and cases cited therein); West Michigan Telecasters, Inc., 460 F.2d 883 (D.C. Cir. 1972); and Carolina Christian, 48 R.R.2d 355 (1980). Given such a devastating and huge loss of service, there is little question that the greater public interest is served by maintaining the service now permitted through the full allocation scheme (channels 2 through 69), rather than mandating a core-channel band, and recapturing channels 2 through 6 and channels 51 through 69 for sale. Moreover, such an action by the Commission would be contrary to the mandate of section 307(b) of the Communications Act of 1934, as amended, 47 U.S.C. § 307(b), which provides that the central purpose for the Commission's allocation table is to ensure there is a "fair, efficient and equitable distribution of broadcast services" available to the entire viewing public. As explained by the Supreme Court in Turner Broadcasting System, Inc. v. FCC, 114 S.Ct. 2445, 2470 (1994), the "basic tenant of national communications policy [is] that the widest possible dissemination of information from diverse and antagonistic sources is essential to the welfare of the public." While translators and LPTV facilities are regulated as "secondary" facilities, it is nevertheless beyond question that the they provide needed, and otherwise

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4/ See exhibits attached to the engineering statement of Kevin Fisher, Exhibit A.

unavailable, free service to significant portions of the American population--particularly in rural and smaller underserved communities. Implementation of DTV with only a core-channel band will eliminate, even based on the Commission's own estimates, no less than 35 to 45 percent of all LPTV stations, and 10 to 20 percent of all translator stations. TBN respectfully submits such losses cannot be reconciled with the public interest. Therefore the core-channel band approach should be recognized as doing more damage than good, and the full current allocation scheme, channels 2 through 69, should remain available for implementation of DTV to ensure the least negative impact on the public as possible.

II. Alternative Means of Lessening the Impact the Commission's DTV Implementation Scheme Will Have on Low Power TV and TV Translator Stations.

5. The Sixth Notice (at 30) seeks "comment on any and all means of lessening the impact on low power TV and TV translator stations." As noted above, TBN is participating in the "Broadcasters' Comments on the Sixth Notice of Proposed Rulemaking," which provides a modified table of allocations which greatly lessens the impact DTV implementation will have on LPTV and TV translators. In addition to the proposals noted therein, TBN, as explained further in the attached engineering statement, proposes the following measures to afford translator and LPTV displaced stations the chance of finding alternative channels:

(1) Eliminate most channel spacing taboos. Relax or eliminate the restrictions for LPTV to LPTV and LPTV to full power NTSC interference standards where the two stations are separated by 2, 13, 4, 5, 7, 14 and 15 channels. These channel taboos are simply antiquated, and based upon receiver characteristics that are no longer applicable.

(2) Terrain limit the Grade B contour protections based upon the Longley-Rice (or other similar) propagation model. The Commission protects the Grade B contour of NTSC facilities based upon a 2-10 mile average terrain

elevation which does not consider interference which may exist within that service area from other full power stations. This prediction method produces unrealistic coverage pictures, and it makes no sense to require an LPTV or translator facility to protect the station's predicted coverage where no actual coverage exists.

(3) Allow co-located translator and LPTV stations on first adjacent channels by diplexing into one transmitting antenna. Such an operation would allow both stations' power levels and antenna patterns to be virtually identical, and there would be no antenna where the two signals would vary by the current 15 dB desired to undesired ratio used to calculate predicted interference.

(4) Allow LPTV and translator facilities operating on first adjacent channels to DTV facilities to operate with greater transmitter power. Such increased power operations would help reduce and minimize the interference operation of the DTV facility, with its higher power, on the LPTV or translator stations' service.

If all of these measures are followed, many more translator and LPTV operations will be able to continue even with the implementation of DTV. While TBN believes only a full allocation table (channels 2 through 69) is appropriate, providing these additional ways to preserve the important and significant levels of free service being provided by LPTV and translator facilities is manifestly in the public interest. They will also help lessen the impact DTV implementation will have on "the fair, efficient and equitable distribution of broadcast services" available to the entire viewing public. (47 U.S.C. § 307(b)).

WHEREFORE, TBN respectfully requests that the Commission modify its implementation of DTV service as noted above, and in accordance with "Broadcasters Comments on the Sixth Notice of Proposed Rulemaking."

Respectfully submitted,

TRINITY BROADCASTING NETWORK

By_____
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Its Attorney

Suite 304
1000 Thomas Jefferson Street, N.W.
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November 22, 1996

EXHIBIT A

ENGINEERING STATEMENT

EXHIBIT A

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of TRINITY BROADCASTING NETWORK ("Trinity") in support of its Comments regarding the Commission's *Sixth Further Notice of Proposed Rule Making* concerning the assignment of digital television (DTV) channels to existing television (NTSC) broadcast stations. Trinity is the licensee of 200 translator stations throughout the United States and holds Construction Permits to build an additional 22 translators. These stations provide free off-air Trinity programing to millions of dedicated viewers.

In its *Sixth Further Notice* the FCC proposes to assign a DTV channel to each of the existing full-power television stations. The Commission also proposes to pack DTV channels into a band between Channels 7 and 52, known as the core region, and ultimately reclaim TV broadcast Channels 2-6 and 52-69 after a transition period during which full-service broadcasters will operate on both DTV and NTSC channels.

However, the Commission has not fully addressed the plight of hundreds of television translators and LPTV facilities which will undoubtedly be displaced either by new DTV facilities or by the reclamation of spectrum by the FCC.

We have analyzed the proposed DTV allotment table with respect to its impact on Trinity's translator facilities. Exhibit B is a list of all Trinity stations that would cause irreparable harm to the reception of DTV signals or would receive incurable interference from DTV facilities as proposed by the Commission. These are instances where a co-channel DTV proposal is within 90 miles of the Trinity translator, or where a first-adjacent-channel DTV

assignment is within 55 miles of the Trinity station. Even in cases where the Trinity station is in the same market as the first-adjacent-channel DTV allotment, the greater power afforded the DTV facility will result in significant interference to the LPTV facility within its protected contour. All 98 of the Trinity translators listed in Exhibit B would be subject to displacement by a DTV operation if the Commission's proposed allotment scheme were put into effect, and they would likely not be able to find a replacement channel in most markets.

The number of people within the present coverage area of these affected translators is 26,005,282. To remove programing from even one Trinity viewer is certainly not in the public interest, but to deprive tens of millions of viewers from this diverse religious programing option is unjustifiable.

Exhibit C is a list of all Trinity translator facilities that are authorized to operate on Channels 52-69, which are outside the core region. Under the Commission's proposed spectrum reclamation plan, 54 Trinity stations would be forced off their present channels, or off the air where no suitable alternative channel is available. These stations provide predicted service to 24,663,388 viewers throughout the United States. It certainly cannot be in the public interest to strip these people of their right to view Trinity programing simply because the FCC wants to auction these channels to other users.

Altogether, over 70 percent (156 of 222) of Trinity's TV translator stations, serving a potential audience of 41,847,448 people, would be adversely affected by the implementation of the FCC's DTV proposal. The Commission must provide a remedy for such a widespread loss.

Trinity strenuously objects to the Commission's packing and reclamation plan, since it wipes out far more of its translator facilities than would a DTV scheme that utilizes all

of the present NTSC channels. It also feels that the reclamation plan is capriciously selfish, in that it would deprive countless viewers, nationwide, of a broadcast service they enjoy simply for a channel auction to generate revenues for government.

With respect to all the Trinity translators and LPTV facilities that would be forced off their present channels by DTV allotments, Trinity suggests that the following measures might afford displaced stations the best chances of finding alternative channels:

1. Relax or eliminate restrictions for LPTV-to-LPTV and LPTV-to-Full Service NTSC interference standards where the two stations are separated by 2, 3, 4, 5, 7, 14, and 15 channels. The present FCC Rules are based upon television receiver characteristics that do not necessarily apply to today's receivers. This approach would provide numerous displacement channels in congested markets.

2. Require displaced translator and LPTV stations simply to protect NTSC and DTV stations' interference-free, terrain-limited Grade B contours, based upon the Longley-Rice (or other similar) propagation model. The FCC presently requires protection of an NTSC facility's Grade B contour based upon the station's 2-10 mile average terrain elevation and is irrespective of existing interference within its service area caused by other full-power stations. This prediction method can produce an unrealistic picture of a station's coverage, and it makes no sense to require an LPTV facility to protect a full-power station's predicted coverage where actual coverage doesn't exist.

3. Permit colocated translator and LPTV stations to operate on first-adjacent channels, as long as the two facilities are diplexed into one transmitting antenna. This approach is based upon the 15 db desired-to-undesired ratio presently used to predict interference between first-adjacent-channel stations. Since both stations' power levels and

azimuth patterns would be virtually identical, and since the elevation patterns would be quite similar, there should be no instance where the two signals would vary by as much as 15 db, and no interference should result.

4. Permit potentially affected or displaced LPTV and translator stations to operate with greater transmitter power, and thus greater effective radiated power, in cases where they are first-adjacent to DTV facilities with significantly higher power and in the same market. This would reduce the amount of interference received by the LPTV or translator station from the DTV station.

Any DTV allotment scheme that provides a second channel to NTSC broadcasters will have a deleterious effect on the nation's translator system. However, the core region and reclamation approach proposed by the Commission in its *Sixth Fur-ther Notice* exacerbates a bad situation. Due to the tragic impact of the proposed DTV allotment scheme on 156 of its 222 authorized television translators, affecting over 40 million viewers, Trinity objects to this approach. Instead, Trinity proposes the above technical changes in the Rules in order to allow future displaced translators an opportunity to continue to provide welcome service to the public.

I declare under penalty of perjury that the foregoing statements and the attached tabulations, which were prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.

KEVIN T. FISHER

November 20, 1996

EXHIBIT B

TRINITY TRANSLATORS POTENTIALLY DISPLACED BY FCC'S PROPOSED DTV ALLOTMENTS

Trinity Translator Station				Interference To/From DTV Allotment			Distance
City of License	Call	Ch.	Population	City of License	Call	Ch.	(miles)
Aberdeen, S. Dak.	K20DA	20	26,439	Ellendale, N. Dak.	KJRE	20	61
Aberdeen, Wash.	K23AS	23	37,178	Seattle, Wash.	KTZZ-TV	23	84
Abilene, Texas	K51CK	51	109,973	San Angelo, Texas	KIDY	51	88
Albany, Ga.	W23AC	23	77,085	Ozark, Ala.	WDFX-TV	23	90
Alexandria, La.	K19DM	19	139,000	Monroe, La.	KLTM-TV	19	66
Anderson, S. C.	W18BF	18	111,785	Toccoa, Ga.	WNEG-TV	19	41
Atlantic City, N. J.	W36BJ	36	229,892	Wilmington, Del.	WHYY-TV	36	63
Bakersfield, Calif.	K55CN	55	162,300	Bakersfield, Calif.	KGET	54	16
Banning, Calif.	K60BB	54	1,885,865	San Bernardino, Calif.	KAGL	55	50
Bend, Ore.	K33AG	33	19,700	Eugene, Ore.	KEVU	33	90
Biloxi, Miss.	W29BH	29	49,311	Biloxi, Miss.	WLOX-TV	28	26
Binghamton, N. Y.	W14AH	26	150,378	Elmira, N. Y.	WENY-TV	25	49
				Corning, N. Y.	WYDC	26	58
Brunswick, Ga.	W33AL	33	28,127	Jacksonville, Fla.	WJXT	33	62
Burlington, Vt.	W16AL	16	194,401	Burlington, Vt.	WVNY	16	20
Cadillac, Mich.	W19BA	18	26,530	Manistee, Mich.	WCMW	18	48
Carson City, Nev.	K19CU	19	377,460	Reno, Nev.	KAME-TV	20	29
				Reno, Nev.	KRXI	18	30
Champaign, Ill.	W34AY	34	137,703	Urbana, Ill.	WILL-TV	33	23
				Terre Haute, Ind.	WTHI-TV	34	76
Charlotte, N. C.	W68BL	52	390,200	Charlotte, N. C.	WSOC-TV	53	7
				Charlotte, N. C.	WBTV	51	21
Chillicothe, Ohio	W40AE	40	38,941	Zanesville, Ohio	WHIZ-TV	40	67
Coeur D'Alene, Idaho	K53FF	53	158,001	Spokane, Wash.	KSPS-TV	54	26
Cookeville, Tenn.	W46AJ	46	47,599	Nashville, Tenn.	WTVF	46	72
Coos Bay, Ore.	K33AO	33	25,804	Eugene, Ore.	KEVU	33	71
Corbin, Ky.	W33BK	33	52,419	Jellico, Tenn.	WPMC	33	38

EXHIBIT B

Trinity Translator Station				Interference To/From DTV Allotment			Distance
City of License	Call	Ch.	Population	City of License	Call	Ch.	(miles)
Cresaptown, Md.	W16AE	43	67,071	Pittsburgh, Pa.	WPCH-TV	43	88
Danforth, Me.	W17BJ	17	1,600	Calais, Me.	WMED-TV	16	51
Decatur, Ill.	W29BG	29	133,501	Olney, Ill.	WUSI-TV	29	82
Denver, Colo.	K33DN	33	1,505,745	Denver, Colo.	KCNC-TV	34	13
Detroit, Mich.	W66BV	66	3,066,303	Toledo, Ohio	WTOL-TV	66	48
Dothan, Ala.	W41BN	41	101,194	Louisville, Ala.	WGIQ	42	34
				Tallahassee, Fla.	WTWC-TV	41	82
Elgin, Ill.	W29BN	29	1,622,742	Chicago, Ill.	WMAQ-TV	29	35
Elmira, N. Y.	W44BG	59	120,708	Rochester, N. Y.	WOKR	59	82
Evansville, Ind.	W38BK	38	244,640	Evansville, Ind.	WEHT	39	7
Fargo, N. Dak.	K56ET	56	134,363	Fargo, N. Dak.	KVLY-TV	56	40
Farmington, Me.	W21BI	21	4,197	Orono, Me.	WMEB-TV	21	78
Fayetteville, Ark.	K42BS	42	45,400	Tulsa, Okla.	KTFO	42	84
Fayetteville, N. C.	W53BE	53	285,707	Fayetteville, N. C.	CKFT	52	32
Fort Smith, Ark.	K27DI	27	76,600	Fayetteville, Ark.	KHOG-TV	28	47
Goldsboro, N. C.	W59BA	59	39,145	Greenville, N. C.	WNCT-TV	58	34
				Durham, N. C.	WTVD	59	36
Greenville, N. C.	W54BR	54	35,740	Washington, N. C.	WITN-TV	53	17
				Wilson, N. C.	WRAY-TV	55	46
Grenada, Miss.	W25BA	25	29,024	Oxford, Miss.	WMAV-TV	25	36
				Greenwood, Miss.	WMAO-TV	24	50
Haverhill, Mass.	W63BR	34	1,376,429	Boston, Mass.	WCVB-TV	34	33
				Marlboro, Mass.	WHSH-TV	33	36
Ithaca, N. Y.	W44BG	44	120,708	Syracuse, N. Y.	WNYS-TV	44	46
Jamestown, N. Y.	W52BT	52	97,497	Erie, Pa.	WJET-TV	52	43
Janesville, Wisc.	W19BH	19	115,601	Madison, Wisc.	WHA-TV	20	35
				Madison, Wisc.	WMTV	19	35
				Chicago, Ill.	WGN-TV	19	90
Lafayette, Ind.	W36AR	36	139,538	Champaign, Ill.	WCIA	36	85
Lake City, Fla.	W23AQ	23	61,201	Jacksonville, Fla.	WJCT	23	64

EXHIBIT B

Trinity Translator Station				Interference To/From DTV Allotment			Distance
City of License	Call	Ch.	Population	City of License	Call	Ch.	(miles)
Lancaster, Calif.	K54DN	54	275,647	Los Angeles, Calif.	KABC-TV	53	33
				San Bernardino, Calif.	KAGL	55	43
				Bakersfield, Calif.	KGET	54	61
Lawton, Okla.	K27AZ	27	80,054	Oklahoma City, Okla.	KETA	27	83
Lincoln, Nebr.	K39AJ	39	191,972	Lincoln, Nebr.	KUON-TV	40	26
Loveland, Colo.	K48CG	48	173,458	Denver, Colo.	KCEC	49	47
Lumberton, N. C.	W52BM	52	91,419	Fayetteville, N. C.	WKFT	52	61
Lynchburg, Va.	W32BA	32	240,090	Charlottesville, Va.	WHTJ	32	53
McComb, Miss.	W36AC	36	64,347	Jackson, Miss.	WJTV	36	69
Machias, Me.	W21BH	21	1,773	Orono, Me.	WMEB-TV	21	54
Madison, Wisc.	W33AX	33	228,208	Janesville, Wisc.	WJNW	32	25
				Milwaukee, Wisc.	WMVS	33	75
Madison, S. Dak.	K27DB	27	13,131	Brookings, S. Dak.	KESD-TV	26	23
Mariposa, Calif.	K28EM	28	195,963	Fresno, Calif.	KVPT	28	64
Meadville, Pa.	W52BO	52	76,776	Erie, Pa.	WJET-TV	52	28
Medway, Me.	W14BO	14	1,584	Presque Isle, Me.	WMEM-TV	14	74
Mermentau, La.	K45DI	45	60,470	Baton Rouge, La.	WGMB	45	78
Modesto, Calif.	Prop'd	49	306,710	San Jose, Calif.	KSTS	49	49
Monroe, La.	K27EF	27	176,525	El Dorado, Ark.	KTVE	28	40
				Alexandria, La.	KLPA-TV	27	69
Monterey, Calif.	K53DT	53	302,927	Watsonville, Calif.	KCAH	52	25
Morristown, Tenn.	W31AS	31	62,081	Knoxville, Tenn.	WKXT-TV	30	39
				Knoxville, Tenn.	WBIR-TV	31	39
Naples, Fla.	W54CC	54	117,908	Fort Myers, Fla.	WINK-TV	53	46
				Fort Myers, Fla.	WBBH-TV	55	47
Oshkosh, Wisc.	W34BV	34	186,032	Milwaukee, Wisc.	WVTV	34	72
Parkersburg, W. Va.	W39AZ	39	72,567	Zanesville, Ohio	WHIZ-TV	40	51
				Weston, W. Va.	WDTV	39	62
Pascagoula, Miss.	W46AV	46	60,170	Mobile, Ala.	WKRG-TV	47	49
				New Orleans, La.	WDSU	46	89
Port Charlotte, Fla.	W52CN	52	61,851	Fort Myers, Fla.	WINK-TV	53	24

EXHIBIT B

Trinity Translator Station				Interference To/From DTV Allotment			Distance
City of License	Call	Ch.	Population	City of License	Call	Ch.	(miles)
Porterville, Calif.	K15CO	15	247,184	Fresno, Calif.	KJEO	15	51
Portsmouth, Ohio	W21AI	21	37,715	Morehead, Ky.	WAOM	21	37
Rapid City, S. Dak.	K33CO	33	88,712	Rapid City, S. Dak.	KOTA-TV	33	2
Ripon, Wisc.	W42AF	42	7,111	Milwaukee, Wisc.	WITI-TV	42	70
Roanoke, Va.	W49AP	49	72,000	Lynchburg, Va.	WSET-TV	49	17
Rocky Mount, N. C.	W53BF	53	152,275	Washington, N. C.	WITN-TV	53	46
Roseburg, Ore.	K14HA	14	35,261	Medford, Ore.	KSYS	15	36
Sacramento, Calif.	K69FB	69	1,016,188	Stockton, Calif.	KOVR	69	24
St. Charles, Mo.	K34BR	34	83,838	St. Louis, Mo.	KMOV	34	21
				St. Louis, Mo.	KPLR-TV	35	21
St. Louis, Mo.	K18BT	18	2,010,645	Mount Vernon, Ill.	WCEE	18	72
St. Petersburg, Fla.	W60BK	60	1,259,317	Clearwater, Fla.	WCLF	59	28
Salina, Kans.	K15CN	15	41,843	Salina, Kans.	KAAS-TV	15	22
Spokane, Wash.	K55EB	55	171,300	Spokane, Wash.	KSKN	55	7
				Spokane, Wash.	KSPS-TV	54	8
				Coeur D'Alene, Idaho	KCDT	56	33
Springfield, Mass.	W67DF	67	936,454	Worcester, Mass.	WUNI	67	48
Springfield, Mo.	K52DH	52	147,815	Rogers, Ark.	KFAA	52	83
State College, Pa.	W42BJ	42	331,949	Altoona, Pa.	WTAJ-TV	41	34
				York, Pa.	WPMT	42	85
Statesville, N. C.	W66BT	66	66,779	Winston-Salem, N. C.	WUNL-TV	66	50
Tahlequah, Okla.	K45ER	45	34,954	Fort Smith, Ark.	KFSM-TV	46	44
				Okmulgee, Okla.	KGLB-TV	45	64
Topeka, Kans.	K21AP	21	122,200	Topeka, Kans.	WIBW-TV	22	21
				Kansas City, Mo.	KYFC	21	62
Utica, N. Y.	W41AE	41	75,632	Syracuse, N. Y.	WIXT	41	42
Ventura, Calif.	K45DU	45	472,510	Rancho Palos Verdes, Cal.	KRPA	45	84
Victorville, Calif	K33BT	33	250,000	Los Angeles, Calif.	KTLA-TV	33	49
				Los Angeles, Calif.	KNBC	32	49
Waukegan, Ill.	W22AJ	22	441,623	Chicago, Ill.	WCFC	21	22
				Milwaukee, Wisc.	WVCY-TV	22	69

EXHIBIT B

Trinity Translator Station				Interference To/From DTV Allotment			Distance
City of License	Call	Ch.	Population	City of License	Call	Ch.	(miles)
Wenatchee, Wash.	K34EM	34	67,525	Yakima, Wash	KAPP	34	62
Wilmington, N. C.	W20AL	20	54,950	Florence, S. C.	WWMB	20	81
Yankton, S. Dak.	K31DP	31	28,282	Sioux City, Iowa	KCAU-TV	31	62
Youngstown, Ohio	W39AI	39	364,694	Cleveland, Ohio	WEWS	39	59
Youngstown, Ohio	W39AI	52	511,169	Erie, Pa.	WJET-TV	52	25
Zanesville, Ohio	W36AY	36	83,952	Cambridge, Ohio	WOUC-TV	35	40
				Columbus, Ohio	WOSU-TV	36	51
	TOTAL		26,005,282				

EXHIBIT C

TRINITY TRANSLATORS AFFECTED BY FCC'S
PROPOSED SPECTRUM RECLAMATION PLAN

City of License	Call	Population
Albany, N. Y.	W64BH	479,007
Atwater, Calif.	K57FD	142,277
Augusta, Ga.	W65BI	110,757
Austin, Texas	K63DR	377,439
Bakersfield, Calif.	K55CN	162,300
Baton Rouge, La.	K56DR	305,370
Cedar Rapids, Iowa	K61FF	135,951
Charlotte, N. C.	W68BL	390,200
Chico/Paradise, Calif.	K67DY	191,317
Coeur d'Alene, Idaho	K53FF	158,001
Columbia, Mo.	K56AU	63,531
Corpus Christi, Texas	K57FC	295,776
Cottonwood, Ariz.	K58AV	5,009
Davenport, Iowa	K58BX	230,000
Dayton, Ohio	W68BP	203,588
Denver/Lookout, Colo.	K57BT	511,085
Denver/Zuni, Colo.	K66FB	1,117,462
Desert Hot Springs, Calif.	K60BB	5,941
Detroit, Mich.	W66BV	3,066,303
Dover, Del.	W68CQ	102,114
Duluth, Minn.	K58CM	168,607
Elkhart, Ind.	W67CY	425,226
Fargo, N. Dak.	K56ET	134,363
Fayetteville, N. C.	W53BE	285,707
Flagstaff, Ariz.	K62BA	43,200

EXHIBIT C

City of License	Call	Population
Fort Myers, Fla.	W67BY	58,035
Globe/Miami, Ariz.	K63DK	17,815
Goldsboro, N. C.	W59BA	39,145
Grants Pass, Ore.	K59DU	14,997
Great Falls, Mont.	K53DW	59,550
Green Bay, Wisc.	W68BS	135,991
Greenville, N. C.	W54BR	35,740
Hopkinsville, Ky.	W62BH	27,318
Klamath Falls, Ore.	K58BG	18,500
Knoxville, Tenn.	W60CF	583,663
Lancaster, Calif.	K54DN	275,647
Las Vegas, Nev.	K57FA	266,766
Lumberton, N. C.	W52BM	91,419
Macon, Ga.	W52CL	254,361
Marietta, Ga.	W55BM	357,548
Meadville, Pa.	W52BO	76,776
Medford, Ore.	K57EK	72,608
Meridian, Miss.	W63BK	81,321
Minneapolis, Minn.	K58BS	1,479,244
Monterey, Calif.	K53DT	302,927
Myrtle Beach, S. C.	W66BJ	99,220
Naples, Fla.	W54CC	117,908
Natchez, Miss.	W58BO	34,523
New Orleans, la.	K59DG	915,199
Norfolk, Nebr.	K52ES	30,570
Ogden, Utah	K64CJ	250,672
Orangeburg, S. C.	W52BK	77,159
Palm Springs, Calif.	K66BM	228,718
Panama City, Fla.	W68CM	117,606

EXHIBIT C

City of License	Call	Population
Pittsburgh, Pa.	W65CG	1,712,402
Port Charlotte, Fla.	W52CN	61,851
Redding, Calif.	K65DJ	53,700
Rochester, Minn.	K60DS	77,824
Rocky Mount, N. C.	W53BF	152,275
Sacramento, Calif.	K69FB	1,016,188
St. Petersburg, Fla.	W60BK	1,259,317
Savannah, Ga.	W67BJ	241,016
Scottsboro, Ala.	W64BJ	231,255
Sebring, Fla.	W60CE	61,901
Shreveport, La.	W65CE	219,000
Sioux Falls, S. Dak.	K66ET	120,452
Spokane, Wash.	K55EB	171,300
Springfield, Mass.	W67DF	936,454
Springfield, Mo.	K52DH	147,815
Statesville, N. C.	W66BT	66,779
Tampa, Fla.	W68CF	865,246
Terre Haute, Ind.	W65BK	125,632
Tucson/Mt. Lemmon, Ariz.	K57BD	398,500
Tucson/Tucson Mtn., Ariz.	K56ED	652,114
Valdosta, Ga.	W66BW	254,537
Waterloo, Iowa	K65BY	115,873
Waupaca, Wisc.	W55BY	56,544
Wichita, Kans.	K59DA	321,270
York Center, Me.	W63BR	139,666
	TOTAL	24,663,388