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January 24, 1997

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

**VIA HAND DELIVERY**

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

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

Dear Mr. Caton:

WatchTV, Inc., through counsel, hereby files the original and five copies of its reply 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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In the Matter of )  
)  
Advanced Television Systems )  
and Their Impact Upon the )  
Existing Television Broadcast )  
Service )

MM Docket No. 87-268

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To: The Commission

REPLY COMMENTS

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

1. WatchTV, Inc., operator of low power television stations in Washington and Oregon,<sup>1</sup> hereby files these brief Reply Comments in response to the Commission's Sixth Further Notice of Proposed Rule Making (FCC 96-207, released August 14, 1996) ("Sixth NPRM"). WatchTV, and the scores of LPTV broadcasters who have participated in this proceeding, have demonstrated the importance of LPTV services in the United States. The record clearly illustrates that the Commission should and must adopt sufficient safeguards to protect this important service.

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<sup>1</sup>WatchTV holds authorizations for the following LPTV stations: K49EI, Channel 49, Ellensburg, Washington; K66EU, Channel 66, Yakima, Washington; K60FX, Channel 60, Kennewick, Washington; K16DD, Channel 16, Pendleton, Oregon; K62DV, Channel 62, Portland, Oregon; K56EI, Channel 56, Portland, Oregon; K19CT, Channel 19, Camas, Washington; K66EJ, Channel 66, Newberg, Oregon; K25EP, Channel 25, Newport, Oregon; K41DF, Channel 41, Eugene, Oregon; K25FG, Channel 25, Roseburg, Oregon; K49DM, Channel 49, Coos Bay, Oregon; K18DW, Channel 18, Redmond, Oregon; K15DO, Channel 15, Bend, Oregon; K20DT, Channel 20, Grants Pass, Oregon; K68EW, Channel 68, Medford, Oregon; and K39DP, Channel 39, Klamath Falls, Oregon. WatchTV has filed an application for a new LPTV station on Channel 28 at Astoria, Oregon, an application to modify the authorization of K66EU to reflect operation on Channel 52, and an application to modify the authorization of K25EP to reflect operation on Channel 55 at Salem, Oregon.

## Discussion

2. One commenter to this proceeding noted, "The public does not differentiate between full service and LPTV stations when they turn on their television sets."<sup>2</sup> Yet, even under the alternate table proposed by the broadcasters' coalition--which utilizes the entire broadcast spectrum--over 1800 LPTV stations and translators, including three of WatchTV's LPTV stations, would be displaced.<sup>3</sup>

3. This wholesale displacement of LPTV stations would disserve the public interest by removing valuable free, over-the-air services. WatchTV, for example, operates a round-the-clock Spanish language service in Oregon and Washington. Its stations' signals reach over two million households, including 140,000 Hispanic households. WatchTV is the only Spanish broadcast service throughout most of this area. Without this service, viewers would be forced to rely upon cable and satellite programming for Spanish language television programs.

4. WatchTV supports a number of the proposals suggested by the Community Broadcasters Association to provide protection for LPTV stations. Specifically, the Commission should fine-tune its rules regarding UHF taboos, directional antennas and terrain shielding to ensure effective spectrum utilization;<sup>4</sup> provide LPTV stations threatened with displacement with the ability to apply for

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<sup>2</sup>See Comments of Engle Broadcasting at 5.

<sup>3</sup>See Broadcasters' Comments at Appendix E4.

<sup>4</sup>See Community Broadcasters Comments at 13-14.

any other channel on a first-come, first-served basis;<sup>5</sup> and adopt rules to ensure that any LPTV station will receive compensation in the event of permanent displacement or multiple channel changes.<sup>6</sup>

#### Conclusion

5. WatchTV has invested substantial resources to develop an innovative broadcast service for residents in Oregon and Washington. In developing the DTV Table of Allotments, the Commission should and must take into consideration the investments of the hundreds of LPTV licensees and the programming they provide in the public interest. Therefore, WatchTV again respectfully requests that the Commission adopt safeguards to afford protection to LPTV stations that are displaced as a result of the transition to DTV.

Respectfully submitted,



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Ann K. Ford  
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<sup>5</sup>Id. at 14.

<sup>6</sup>Id. at 18.