

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

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**ORIGINAL**

In the Matter of )  
)  
Advanced Television Systems and )  
Their Impact upon the Existing )  
Television Broadcast Service )

**MM Docket No. 87-268**

**RECEIVED**

To: The Commission - Mail Stop 1170

JAN 24 1977

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

**REPLY COMMENTS OF THE COMMUNITY BROADCASTERS ASSOCIATION**

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January 24, 1977

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049

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## SUMMARY

i. Much progress has been made, but more remains to be done before a smooth transition can be made to digital TV. Allotting digital channels without regard to LPTV and translators will cause more loss of service than initially anticipated. LPTV operators are dismayed and incredulous at what their government proposes to do to them. Full power stations want to improve the engineering underpinnings of the allotment table to avoid dooming some to inferior coverage and others to buying unaffordable or unavailable high powered transmitters.

ii. The damage to LPTV should not, and need not, be so severe. The Commission should gather data on actual LPTV service, adopt more up-to-date technical standards, re-run the digital allotment program based on more accurate station data and updated standards, and take steps to facilitate accommodation of displaced LPTV stations. CBA has undertaken efforts in all these areas, gathering information about station operations and local programming and working with Commission computer software to generate digital allotment tables based on a penalty for displacing LPTV stations and the AFCCE's proposed planning factors.

iii. CBA's data-gathering was rudimentary. The results should not be considered definitive, but they suggest the order of magnitude of LPTV activity. CBA understands that the Commission's Staff has been gathering data by spot checks. No survey should be used for official purposes, and no authorized station should be disregarded in the digital allotment process, without official notice to all stations and publication in the *Federal Register*.

iv. Initial commenters made numerous suggestions to improve TV technical standards. CBA adheres to the suggestions it made. CBA's proposal regarding interference standards is clarified in Appendix 3. CBA challenges the "full replication" concept; a second channel should be used for transitional purposes only, without full replication. CBA also supports AFCCE's

proposal for more realistic power levels for digital operation; an 500 kW ERP limit would free significant spectrum to accommodate LPTV stations and translators.

v. Additional mitigating steps should be taken now, not left to compete with other matters for the Commission's future attention. These include avoiding premature truncation of the TV spectrum, setting aside channels for displaced LPTV's, conforming LPTV interference standards to full power standards, changing digital allotments to save LPTV stations when no harm will be done to full power, ordering that private coordinating committees admit and listen to LPTV operators, providing preferred opportunities for LPTV operators to apply for digital channels, maintaining the full power freeze, establishing a new permanent station class, using cable to preserve LPTV programming, and compensating displaced LPTV operators.

vi. Each participant in this proceeding has its own goals. LPTV wants to survive and to continue providing otherwise unavailable service to the public. Full power TV is ready to proceed but believes that improvements are required in the technical underpinnings for the change to digital operation. The public wants better programming for their children, education, and the exchange of ideas. The government wants the most money it can get at auction as soon as it can get it. Is that not a strange role reversal, where entrepreneurs want to provide service and the government wants to make money? The Communications Act does not prescribe that as the primary mission of the Commission; most of the time the roles are cast the other way.

vii. It is well-established that the loss of free broadcasting service is *prima facie* not in the public interest. Preserving service is the Commission's primary mission, even today when "competition" is almost the only watchword. Auction prices are already falling. Deferring TV spectrum auctions will reduce the chance of error in an uncertain digital transition process and will also increase the revenue obtained as spectrum value increases. A quick 1997 auction will

dissipate a valuable asset forever. The temporary revenue bulge will soon be forgotten, but the public will not forget when its TV sets go dark.

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**REPLY COMMENTS OF THE COMMUNITY BROADCASTERS ASSOCIATION**

**Introduction**

1. The **Community Broadcasters Association (CBA)** hereby submits its reply comments in this proceeding. CBA is the trade association of the nation's low power television (LPTV) stations. CBA filed initial comments on November 22, 1996.

2. While much progress has been made in this proceeding, more remains to be done before a smooth transition can be achieved between today's analog and tomorrow's digital television. CBA believes that the following points have now been established:

a. Allotting digital channels without regard to LPTV stations and translators, as the Commission has proposed, will cause a significantly greater loss of LPTV and translator service than was initially anticipated, more than is necessary, and more than is justifiable in the public interest.

b. LPTV operators everywhere are dismayed and incredulous that the government they helped to elect would summarily execute their industry at worst, or at best push it aside during the most fundamental reconstruction of the television spectrum since nationwide allotments were first made in the 1950's and leave its fate to be

addressed later on with whatever may be left over. The LPTV industry represents an entrepreneurial effort in the best American tradition, provides important programming services not otherwise available, is growing and creating new jobs at a rapid pace, and is entitled to the protection of small business laws.

c. The full power television industry is ready to proceed with the transition but is nervous about the proposed digital channel allotment process because of database errors, premature truncation of the television spectrum, inappropriate planning factors, and impractical proposals that would doom some stations to inferior coverage while requiring others to purchase unaffordable and/or unavailable high powered transmitters.

d. The public would like to obtain some meaningful benefit from the transition in terms of better programming, particularly directed toward children, education, and an improved political process; and the public is more concerned about programming than improving the technical quality of television signals.

3. CBA is attempting to address many of these problems by (a) gathering data about the status of the LPTV industry, (b) making concrete suggestions as to changes in engineering standards to improve spectrum efficiency, and (c) demonstrating how the application of CBA's suggestions will reduce damage from the digital allotment process.

#### **Damage Unnecessarily Severe**

4. Because the Commission's digital allotment computer program and the programs used to locate available channels for LPTV stations and translators both search for channels with the least interference potential, it should not be surprising that they often find the same channels and that as a result, displacement of LPTV stations and translators will be severe if they are not

taken into account in the digital allotment program. The Broadcasters Caucus has identified over 3,000 stations that will be displaced. Even if not all those stations actually exist,<sup>1/</sup> it is clear that hundreds, if not a thousand or more, of viable, operating facilities will be displaced. CBA does not have the resources to analyze every station, but the number of alarms it has received from LPTV operators makes it clear that the allotment table as now proposed will wreak havoc in hundreds of markets, both large and small, with the result that important sources of local and minority and other specialized television programming will be lost.

5. One example of unnecessary displacement is the proposed pairing of DTV Channel 20 with NTSC Channel 12 at Ardmore, Oklahoma, when there is an LPTV station affiliated with a major television network (KOKT-LP) operating on Channel 20 in Sulphur, Oklahoma, about 25 miles away. The only other nearby NTSC station operates on Channel 10 at Ada, Oklahoma. With only two NTSC stations in the area, TV spectrum cannot possibly be so scarce that displacement of the LPTV station is necessary.

6. The damage to the LPTV industry should not be, and does not have to be, so severe. Three steps must be taken to ameliorate the situation: (a) gather data as to what stations are in operation and what services are being provided, so that we know what services need to be protected; (b) adopt more up-to-date technical standards that will provide more ways to accommodate LPTV stations and translators; (c) re-run the digital channel allotment program based on data which include operating LPTV stations and updated technical standards; and (d) adopt steps to facilitate the accommodation of displaced stations and to put the displacement

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<sup>1/</sup> See par. 7-11, *infra*.

problem to rest for once and for all by creating a class of permanent station for those that qualify.

### **Gathering Data**

7. CBA has undertaken substantial efforts to gather data about operating LPTV stations and the services they provide. It does not have a definitive mailing list of LPTV stations, but it circulated a questionnaire to as many stations as it could find, requesting information about whether the station is on the air and what programming it provides. Stations were asked to provide the make, model, and serial number of their transmitter and to sign a statement under penalty of perjury to ensure the most accurate count possible of stations actually operating. CBA received more than 430 completed questionnaires from operating stations, along with e-mail and other messages bringing the total to the range of 450-500 stations, along with 126 completed questionnaires from holders of construction permits who are actively planning to build and go on the air. Since the response surely did not represent 100% of operating stations, it is likely that the number of operating LPTV stations is actually in the order of 500-600.

8. The questionnaires are too bulky to be submitted in the requisite number of copies for the record in this proceeding. One copy will be provided to the Commission's Staff. To facilitate review, Appendix 1 to these Reply Comments is a list of the responding stations. This list has been incorporated into a Lotus database, which CBA will provide on diskette for use by the Commission's Staff.<sup>2/</sup>

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<sup>2/</sup> The list gives the name of the person responding to the questionnaire, not the name of the licensee of the station.

9. CBA further attempted to gather information about the amounts and kinds of local programming that LPTV stations are providing. This information is much more difficult to obtain than information as to whether a station is on the air, because it requires more than a "yes" or "no" response. Appendix 2 to these Reply Comments is a listing of responses received from 122 stations, which is all that CBA had time to compile by today's filing deadline. While Appendix 1 contains an entry for the number of hours of local programming per week for each station when the station provided that information on its questionnaire,<sup>3/</sup> Appendix 2 includes more descriptive information about the programming.

10. These data-gathering efforts were rudimentary, as CBA does not have the resources to ensure the completeness of its survey or to call stations back for missing data. However, the results demonstrate (a) the approximate size of the industry (it is very unlikely that the number of operating stations is anything close to the 1,954 number of licensed LPTV stations as of December 31, 1996<sup>4/</sup>) and (b) the fact that the industry is presenting a substantial amount of local programming of great value to communities across the nation.

11. CBA's computer studies take into account only stations that responded to CBA. While the list may reflect the order of magnitude of the size of the LPTV industry, it would be inappropriate to take CBA's list, or any other currently available list for that matter, as definitive

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<sup>3/</sup> Some of the information was difficult to interpret, so CBA cannot say that the numbers it is providing are accurate for each individual station. However, the numbers as a whole give a good industry-wide picture of the extent to which local programming is found on LPTV stations.

<sup>4/</sup> See FCC public notice of January 21, 1997.

evidence of what stations are in actual existence.<sup>5/</sup> CBA understands that Commission Staff personnel in the Compliance and Information Bureau have been making spot checks around the country to determine the status of LPTV stations. The use of that survey method for any official purpose is also improper, assuming that the information-gathering process is lawful without approval of the Office of Management and Budget in the first place.<sup>6/</sup> CBA agrees that it is important to gather information about the actual status of the LPTV industry and to purge the database of non-existent stations. However, that objective must be achieved through an official, lawful process, with proper written notice to stations whose fate may be affected by the survey results and proper notice to the public through the *Federal Register*. No authorized station should be disregarded in the digital allotment process, or for any other purpose affecting its official status, without giving proper notice and following proper legal procedures.

### **Improved Technical Standards**

12. Numerous suggestions have been made in initial comments as to how TV technical standards can be improved to make more efficient use of the spectrum and to minimize displacement of LPTV and translator stations. CBA made several such suggestions, and it continues to urge the Commission to adopt them. One area where some confusion has apparently arisen relates to CBA's request that interference standards between an LPTV station

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<sup>5/</sup> Not only does CBA not have the resources to track down every station but CBA also has no authority to compel a response from any station. While the Commission provided CBA with a copy of its mailing address list, that list did not distinguish between translators and LPTV stations. As translators outnumber LPTV's by a factor of almost 4-to-1, the list was too long for CBA to be able to cover all of it with a mailing.

<sup>6/</sup> CBA has no idea of how the CIB decided which stations to call or what information sources they are using to locate those stations.

and a full power station not be more stringent than those applied between two full power stations. CBA is proposing that co-channel LPTV stations which are outside the protected coverage contour of a full power TV station be permitted to use the same interference protection that full power TV stations provide to each other. Although that approach would involve a relaxation of the existing LPTV rules, the full power standards have been proven satisfactory over several decades without significant problems. Their adoption for LPTV would free up spectrum in areas where it would otherwise be unnecessarily blocked in a time of anticipated severe spectrum shortage. Appendix 3 hereto is a copy of a recent letter from Third Coast Broadcasting, Inc. to the National Telecommunications and Information Administration clarifying CBA's interference proposal.

13. The Association of Federal Communications Consulting Engineers (AFCCE) has pointed out the extreme and often impractical, if not impossible, burden the Commission is proposing to put on some full power stations through its "full replication" concept, which will require some VHF NTSC stations to utilize UHF DTV transmitters so powerful that they will be prohibitively costly or perhaps not available at all. CBA has urged, and continues to urge, that the Commission not seek full replication of service area on the transitional full power channel during the time when two channels are in use. CBA supports AFCCE's proposal to specify more realistic power levels for the final digital channel as well. The results of CBA's computer studies of digital allotments is expected to demonstrate that if digital ERP is limited to a reasonable level of 500 kW, significant new spectrum capacity will be freed up to accommodate LPTV stations and translators.

14. In sum, the LPTV/translator problem will be significantly alleviated if the second channel is used for transitional purposes only, with only Grade A service area replication, and full power stations end up providing digital service on their original NTSC channel at the end of the transition period with realistic power limits.<sup>7/</sup>

15. CBA is working with software obtained from the Commission and is running that software to generate digital allotment tables based on variations in the assumptions used by the Commission. First, the program is being run with those LPTV stations which CBA knows are operating added to the database, and a penalty assigned for displacing those stations. Second, the program is being run based on the planning factors urged by AFCCE. CBA anticipates that these computer runs will demonstrate conclusively that there is no need to destroy the LPTV service to make way for digital television. However, it has not been possible to complete the runs by the deadline for these Reply Comments.<sup>8/</sup> CBA plans to submit the results of its work as an *ex parte* filing within the next few weeks.

### **Positive Steps To Preserve LPTV**

16. Including an accurate count of LPTV stations in the database, providing a penalty in computer runs for displacing those stations, and modernizing technical standards are important

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<sup>7/</sup> Those full power UHF stations that have argued that they should be permitted a larger digital service area than their analog area, to equalize their competitive status with VHF stations, should be permitted to improve their digital facilities only if there is no displacement of LPTV service or any displaced service can be accommodated on another channel.

<sup>8/</sup> CBA has had only a few months to figure out how to operate software to generate an allotment table, while the Commission and full power industry have worked on the problem for years. It is not surprising that CBA has not been able to complete the task by now, and it is noteworthy that CBA has achieved as much as it has in so short a time with the limited resources available to it.

to help minimize the displacement of LPTV and translator stations; but there is much more that the Commission can do to preserve LPTV service. Additional steps should be taken in this proceeding, not deferred to some uncertain time in the future when they will have to struggle for attention against other Commission priorities.

17. Not Truncating the Spectrum. The premature truncation of the spectrum will unquestionably and substantially exacerbate the threat to LPTV and translators. Both CBA and the Broadcasters Caucus have emphasized that point in the strongest possible terms. CBA understands that auction revenues of some \$5 billion from the sale of Channels 60-69 will be included in the Administration's budget and that the government for all practical purposes has a closed mind on this subject. That is too bad; but if the government is determined to go that route, then it must stop there and not truncate the spectrum any further until the end of the transition to digital TV. In addition, even if some spectrum is sold in the near future, purchasers should be required to protect incumbent operating stations, both full and low power alike, until the end of the transition or until they are able to find other spectrum for those stations and pay the cost of relocation.<sup>9/</sup>

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<sup>9/</sup> Public safety agencies also have their eye on TV spectrum, and they appear more anxious to acquire new "real estate" than to improve efficiency by participating in channel-splitting to 12.5 and ultimately to 6.25 kHz, as commercial private radio operators are being required to do as part of the "refarming" concept in PR Docket No. 92-235. Some may also lose sight of the fact that if TV spectrum is reallocated to public safety use, new radio equipment will have to be manufactured and paid for before the spectrum will be of any use. While CBA supports improved protection for the public by police and other safety agencies, these agencies often do not have the budgets to buy new equipment. They may be able to purchase commercial narrowband equipment at better prices than equipment designed for public safety use on new frequencies, because of economies of scale arising from volume manufacturing for the private sector. It is also important to note that the deletion of many LPTV stations will eliminate important -- sometimes the only ones -- for the broadcast dissemination of local emergency and  
(continued...)

18. LPTV Set-Aside. If the spectrum is to be truncated, the Commission should set aside a small portion for LPTV stations that cannot otherwise be accommodated. Such a set-aside could be at the lower end of the Channel 60-69 band, certainly in the Channel 52-59 band if the TV spectrum is truncated below Channel 60, and perhaps even on Channel 14 to minimize the potential for the kind of blanketing interference to land mobile operations in the immediately-adjacent 450-470 MHz band that has been experienced when 5-million watt UHF TV stations have gone on the air on Channel 14.

19. Interference Rules. CBA urged various modifications to interference rules in its initial comments and continues to urge them. Freeing channels that would be unnecessarily restricted by the current rules would significantly help reduce the problem of LPTV stations being forced off the air by the spectrum shortfall during the digital transition. The attached statement of Third Coast Broadcasting, Inc. elaborates on this issue.<sup>10/</sup>

20. Changing Digital Allotments. Before an LPTV station is displaced, the Commission should determine whether the displacing full power station can be accommodated on another digital channel with no significant detriment; and if it can be so accommodated, the digital allotment should be changed instead of displacing the LPTV station.

21. Participation in Private Activities. The Broadcasters Caucus has urged that considerable discretion be given to private coordinating committees to recommend changes in

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9/(...continued)

safety information in many communities. The Commission should not reallocate TV spectrum to public safety use now, unless it takes it from spectrum otherwise marked for auction to commercial users.

10/ See Appendix 3, discussed in more detail in par. 12 *supra*.

the digital allotment table and that such recommendations be given heavy weight. If private groups are to have such an influence on the allotment process, it is imperative that LPTV stations be permitted to participate. The full power stations who will staff these committees are often competitors of LPTV stations and as a result will have an economic incentive to displace LPTV stations. Not only must LPTV stations be permitted to be present but the Commission must require that full power stations listen to and work in good faith to accommodate LPTV stations. Without the legal right to be present and to be heard, LPTV operators will be shut out of what is for them a life-or-death process.

22. Preferred Filing Opportunity. Displaced LPTV stations must be given the first opportunity to apply for any available spectrum after full power stations have been accommodated, and even LPTV stations that are not displaced must be given an opportunity to apply for channels for digital operation, before any full power digital channel allotments are made that are not paired with now-existing NTSC full power stations and before anyone other than a licensee of a full power station authorized as of the date of the *Sixth Further Notice of Proposed Rule Making* in this proceeding is permitted to apply for a digital channel.<sup>11/</sup>

23. Maintain the Full Power Freeze. In the *Sixth Further Notice*, the Commission offered a short and final window of opportunity for the public to file applications for new stations on vacant NTSC full power allotments. The number of applications filed appears to be in the hundreds, which is many more than likely were anticipated when the filing opportunity was provided. Permitting the establishment of so many new stations will seriously impair the

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<sup>11/</sup> CBA is gratified that the Broadcasters Caucus has recognized the merit of preferred filing opportunities for LPTV stations. Caucus Comments at p. 54.

amount of spectrum available to accommodate LPTV stations and translators displaced by digital full power stations. The Commission should adhere to its freeze on full power applications, at least in major market areas, and should make exceptions based only on compelling circumstances consistent with prior freeze waivers.

24. Establish a New Permanent Class of Station. The LPTV industry has grown and matured and has demonstrated that many stations are entitled to a permanent place in the mass media structure. As CBA urged in its initial comments in this proceeding, the Commission should create a new class of primary television station, akin to "Class A" FM radio broadcast stations, with appropriate technical and operational standards and requirements; and stations which apply and demonstrate that they meet those standards and requirements should no longer be secondary.

25. Cable Carriage. Mandatory cable carriage should be used to continue delivery to the public of the programming service of LPTV stations that must go off the air during the transitional period to digital operation, especially where it can be determined that after the transition, there will be room for the LPTV station to resume over-the-air service.

26. Compensation. Where an LPTV station is required to change channels one or more times, the station causing the displacement should be required to bear the cost.<sup>12/</sup> And if all else fails and LPTV stations are ultimately required to cease operation permanently to make

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<sup>12/</sup> The Broadcasters Caucus (at p. 39) recognizes the extraordinary burden imposed when a TV station of any kind must change channels, especially when it must do so more than once. The Caucus also supports the compensation concept for multiple channel changes, at least for its full power members (p. 16).

room for a digital full power station, the digital licensee again should be required to compensate the LPTV operators for the loss of their business.

### **Conclusion**

27. It is instructive to summarize the positions of the major participants in this proceeding one more time:

a. The low power industry wants to survive and to continue to provide service to the public which is otherwise unavailable.

b. The full power industry is ready to move forward but believes that improvements are required in the technical underpinnings for the change to digital operation.

c. The public wants better programming for their children, for education, and for the exchange of political and other ideas.

d. And what does the government say it wants? The most money it can get at auction as soon as it can get it.

28. Is that not a strange role reversal, where entrepreneurs want to provide service and the government wants to make money? The Communications Act does not prescribe that as the primary mission of the Commission, and most of the time the roles are cast the other way around. CBA has been told in meetings with government officials that the public mandated a balanced budget in the 1996 election, so balance the budget they will. But the public did not vote to shut down television stations, nor is it likely that the public will tolerate such shut-downs if they occur. And certainly those members of the public who filed comments in this proceeding

articulated public service objectives which are often met by LPTV stations, not monetary objectives.

29. As the Broadcasters Caucus properly pointed out at page 29 of their initial comments, the loss of free broadcasting service to the public is *prima facie* not in the public interest. Preserving that service is the Commission's primary mission and is one that it must not forget. With the increasing amount of spectrum that has recently gone on the auction block, prices are already going down.<sup>13/</sup> Broadcasters have repeatedly pointed out that deferring the auction of TV spectrum will not only reduce the chance of error in a digital transition process that will be full of unknown practical pitfalls<sup>14/</sup> but will also increase the amount of auction revenue that will be obtained as the value of the spectrum increases over time. A quick auction

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<sup>13/</sup> The D, E, and F-block PCS auction yielded far less than the C-block auction. As more and more spectrum is put on the market, there is no evidence that the result will be anything other than the price decline that normally follows an increase in supply.

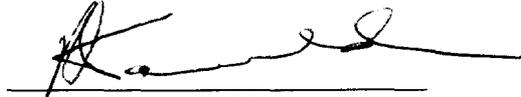
<sup>14/</sup> As noted by AFCCE in its initial comments, DTV stations may cause greater interference to NTSC stations than the Commission has anticipated in its proposed channel allotment plan, especially if hoped-for collocation is not always feasible in practice. In such interference occurs, Channels 60-69 may be needed to provide relief.

in 1997 will dissipate a valuable asset forever, and the temporary revenue bulge will soon be forgotten. However, the public will not forget when its television sets go dark.

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January 24, 1997

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**APPENDIX 1**

Reply Comments of the Community Broadcasters Association

MM Docket No. 87-268

List of low power television stations providing information to CBA stating that they are in operation.

01-24-1997 04:24PM FROM JOHN CHNF 4-11-97 222128000 P. 01

Weekly Hours  
Local Prog.

First	Last	Call Sign	Address	City	State	ZIP	Telephone	On Air	Local Prog.
Dan H	Martin	WHAN-17	P O Box 385 Hwy 56 E	Salem	IN	47167	813-883-5750	YES	40
Robert	McCloin	W06BD-6	P O Box 49 Old Hwy 41	Princeton	IN	47670	812-385-5292	YES	11.5
Roger	Harders	K17DW-17	478 East 15th	Wahoo	NE	68066	402-443-3798	YES	
Roger	Harders	K39EK39	478 East 15th	Wahoo	NE	68066	402-443-3198	YES	
Roger	Harders	K65GE-65	478 East 15th	Wahoo	NE	68066	402-443-3198	YES	
Roger	Harders	K69HF-69	478 East 15th	Wahoo	NE	68066	402-443-3198	YES	
Roger	Harders	K67GP-67	478 East 15th	Wahoo	NE	68066	402-443-3198	YES	
Roger	Harders	K63FW	478 East 15th	Wahoo	NE	68066	402-443-3198	YES	
Roger	Harders	K61GQ-61	478 East 15th	Wahoo	NE	68066	402-443-3198	YES	
Roger	Harders	K50EG-50	478 East 15th	Wahoo	NE	68066	402-443-3198	YES	
David	Harders	K50EG-50	478 East 15th	Wahoo	NE	68066	402-443-3198	YES	
David	Harders	K48FF-48	478 East 15th	Wahoo	NE	68066	402-443-3198	YES	
David	Harders	K46EE-46	478 East 15th	Wahoo	NE	68066	402-443-3198	YES	
David	Harders	K44EJ-44	478 East 15th	Wahoo	NE	68066	402-443-3198	YES	
David	Brodahl	K21ES-21	478 East 15th	Wahoo	NE	68066	402-431-3198	YES	
David	Brodahl	K31EN-23	478 East 15th	Wahoo	NE	68066	402-431-3198	YES	
David	Brodahl	K33EM	478 East 15th	Wahoo	NE	68066	402-431-3198	YES	
Mary	Harders	Ch 63	478 East 15th	Wahoo	NE	68066	402-431-3198	YES	
Mary	Harders	K59FT-59	478 East 15th	Wahoo	NE	68066	402-431-3198	YES	
Mary	Harders	Ch 52	478 East 15th	Wahoo	NE	68066	402-431-3198		
Mary	Harders	X29DM-29	478 East 15th	Wahoo	NE	68066	402-431-3198		
Laritta	West	K36EF	478 East 15th	Wahoo	NE	68066	402-431-3198	YES	
Laritta	West	33EO-54	478 East 15th	Wahoo	NE	68066	402-431-3198		
Laritta	West	K38EO-38	478 East 15th	Wahoo	NE	68066	402-431-3198	YES	
Glenda	Harders	Ch14	478 East 15th	Wahoo	NE	68066	402-431-3198		
Glenda	Harders	K53FL-58	478 East 15th	Wahoo	NE	68066	402-431-3198	YES	
Glenda	Harders	K54EU	478 East 15th	Wahoo	NE	68066	402-431-3198	YES	
Glenda	Harders	K52EX-52	478 East 15th	Wahoo	NE	68066	402-431-3198	YES	
Glenda	Harders	K24ED-49	478 East 15th	Wahoo	NE	68066	402-431-3198	YES	
Glenda	Harders	K47EY-47	478 East 15th	Wahoo	NE	68066	402-431-3198	YES	
Glenda	Harders	K28EN-28	478 East 15th	Wahoo	NE	68066	402-431-3198	YES	
Glenda	Harders	K45EO-45	478 East 15th	Wahoo	NE	68066	402-431-3198	YES	
Glenda	Harders	K23EL23	478 East 15th	Wahoo	NE	68066	402-431-3198	YES	

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selective	TV, Inc	K62AO-62	PO Box 665	Alexandria	MN	56308	320-763-5924	YES	
Darwin	Paustian	K63FD-63	2675 E Flamingo Rd.#6	Las Vegas	NE	89121	702-431-6363	YES	
Gary	Jezbera	K17CI-17	PO Box 220	Kearney	NE	68848	308-743-2994	YES	
Gary	Jezbera	K25FE-25	PO Box 220	Kearney	NE	68848	308-743-2494	YES	
Gary	Jezbera	K13VO-13	PO Box 220	Kearney	NE	68848	308-743-2494	YES	
Gary	Jezbera	K22CX-22	PO Box 220	Kearney	NE	68848	308-743-2494	YES	
Gary	Jezbera	K18CD-18	PO Box 220	Kearney	NE	68848	308-743-2494	YES	
Randolph	Weigner	W29BA-29	29 Douglas Dr.	Meredith	NH	3253	603-279-4758	YES	
Randolph	Weigner	K25DU-25	29 Douglas Dr.	Meredith	NH	3253	603-279-4758	YES	
Randolph	Weigner	K62CY-62	29 Douglas Dr.	Meredith	NH	3253	603-279-4758	YES	
Randolph	Weigner	W38BR-38	29 Douglas Dr	Meredith	NH	3253	603-279-4758	YES	
Randolph	Weigner	K25DU-25	29 Douglas Dr.	Meredith	NH	3253	603-279-4758	YES	
Randolph	Weigner	W29BA-29	29 Douglas Dr.	Meredith	NH	3253	603-279-4758	YES	
Randolph	Weigner	K62CY-62	29 Douglas Dr.	Meredith	NH	3253	603-279-4758	YES	
Randolph	Weigner	W40BI-40	29 Douglas Dr.	Meredith	NH	32530	603-279-4758	YES	
Randolph	Weigner	W32AS-32	29 Douglas Dr.	Meredith	NH	3523	603-279-4758	YES	
Louis A.	Zanoni	W25AW	77 shady Lane	Trenton	NJ	8619	609-586-5088	YES	
Paul	Engle	WOCC-8	P O Box 288	Cedar Brook	NJ	8018	609-767-8884	YES	
Paul	Engle	Displaced-	PO Box 288	Cedar Brook			609-767-8884	YES	
Richard	Bogner	WNXY-54	4 Hunters Lane	Roslyn	NY	11576	516-627-5103	YES	
Richard	Bogner	WNYX-44	4 Hunters Lane	Roslyn	NY	11576	516-627-5103	YES	
Charles F.	Adams	WNCE-8	1 Mockingbird Lane	Queensburg	NY	12804	518-798-8000	YES	
Lay	Simpson	W42AE-42	53 Pendell Road	Poughkeeps	NY	12603	914-431-8947	YES	
Nancy	Montegano	WKOB-53	350 Fifth Ave #3021	New York	NY	10118	212-736-7800	YES	
Ferry	Kemper	W17BM-17	32E 10th St	New York	NY	10003	212-254-5499	YES	
Elsie	DeLair	W39BC-39	2095 Lakeview Rd	Lakeview	NY	14085	716-627-4038	YES	
Jale	Buschow		RI2 Boc 7	Blue Hill	NE	68930	402-756-3276	YES	
Gary	Jazbera	K18CD-18	P O Box 220	Kearney	NE	68848	308-743-2494	YES	
Gary	Jazbera	K25FE-25	P O Box 220	Kearney	NE	68848	308-743-2494	YES	
Gary	Jazbera	K13VO-13	P O Box 220	Kearney	NE	68848	308-743-2494	YES	
Gary	Jazbera	K22CX-22	P O Box 220	Kearney	NE	68848	308-743-2494	YES	
Gary	Jazbera	K17CI-17	P O Box 220	Kearney	NE	68848	308-743-2494	YES	
Thomas B.	Buchanan	W46BF-46	P O Box 1176	Sanford	NC	27331	919-776-8612	YES	
Ferry	Johnson	WHFL-56	P O Box 282	Goldsboro	NC	27533	919-736-7729	YES	

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John	Smith	WJYL-26	825 University Woods Dr	New Albany	IN	47150	812-949-9595	YES	12
Paul	Knies	WJTS-27	PO Box 1009	Jasper	IN	75461	812-482-2727	YES	21
Eric	Meyer	WREP-15	PO Box 1636	Martinville	IN	46151	317-342-3311	YES	30
Jeffrey W.	Gnagay	WIWU-51	4201 S.Washington St.	Marion	IN	46953	317-677-2819	YES	20
Skip	Simms	WTSN-63	44 Main St.	Evansville	IN	47708	812-464-4463	YES	0
Bill	Morgensen	K55HM-55	756 College Dr	Twin Falls	ID	83301	208-734-2090	YES	
Stan	Byers	WOCK-13	3654 W Jarkins	Skokie	IL	60076	847-674-0864	YES	0
Stan	Byers	WOCH-28	3654 W Jarkins	Skokie	IL	60076	847-674-0864	YES	0
Stan	Byers	WSKC-59	3654 W Jarkins	Skokie	IL	60076	847-674-0864	YES	0
Stan	Byers	WMKE-8	3654 W Jarkins	Skokie	IL	60076	847-674-0864	YES	0
Stan	Byers	WOCH-4	3654 W Jarkins	Skokie	IL	60076	847-674-0864	YES	0
Stan	Byers	WSKC-4	3654 W Jarkins	Skokie	IL	60076	847-674-0864	YES	0
Fred	Church	W57BS-57	3401 Fosterburg Rd	Alton	IL	62002	618-463-5757	YES	25
Murion C	Burse	W67CW-67	P O Box 1493	Peoria	IL	61655	309-673-3542	YES	0
Robert	Raff	K17CK-17	222 W 6th St	Junction City	KS	66441	913-762-5055	YES	
Gary	Hawke	KUJH-14	2057 Dole Center	Lawrence	KS	66045	913-864-0600	YES	
Robert	Raff	K15DQ-15	222 W 6th Street	Junction City	KS	66441	913-762-5055	YES	
Robert	Raff	K43EO-43	222 W 6th Street	Junction City	KS	66441	913-762-5055	YES	
Robert	Raff	KTMJ-6	222 W 6th Street	Junction City	KS	66441	913-864-3352	YES	5
Beck	Marion	K68OK-68	Continuing Ed Bldg	Lawrence	KS	66045	316-267-8855	YES	12
Ron	Nutt	KCTU-55	622 E Central	Wichita	KS	67202	316-267-8855	YES	14
Ron	Nutt	KSMI-51	622 E Central	Wichita	KS	67202	316-267-8855	YES	11
Ron	Nutt	KCTU-55	622 E Central	Wichita	KS	67202	502-451-9000	YES	
Jerone	Hutchinson	WYCS-24	4421 Bishop Ln #600	Louisville	KY	40219	502-885-4300	YES	4
Edward	Owen	WKAG-43	P O Box 4300	Hopkinsville	KY	42241	502-885-4300	YES	
JT	Whitlock	W06RY-6	480 Radio Sta Road	Lebanon	KY	40033	692-3126	YES	35
			P O Box 680					YES	10
Joey	Kesler	W09B2-9	1337 Old Hare Rd	E Bernstad	KY	40729	609-843-9979	YES	
Bill	Spitter	W67BA-67	1660 Soldiers Field Rd	Boston	MA	2135	617-787-6868	YES	
James	McLead	WBGR-33	2881 Ohio St #6	Banger	MA	4401	207-947-3300	YES	17
Tod	Lancaster	WEIL-41	PO Box 746	Effingham	IL	62401	217-342-2334	YES	
Gwendoly	Christopher	W11BC-11	1310 Guilford Ave.	Baltimore	MD	21202	410-547-6753	YES	1
Gwendoly	Christopher	W44AZ-44	1310 Guilford Ave.	Baltimore	MD	21202	410-547-6753	YES	
Gwendoly	Christopher	W10CK-10	1310 Guilford Ave.	Baltimore	MD	21202	410-547-6753	YES	

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Gwendoly	Christopher	W58BX-58	1310 Guilford Ave.	Baltimore	MD	21202	410-547-6753	YES	
Gwendoly	Christopher	W18AW-18	1310 Guilford Ave.	Baltimore	MD	21202	410-547-6753	YES	
Gwendoly	Christopher	W68CH-68	1310 Guilford Ave.	Baltimore	MD	21202	410-547-6753	YES	
Gwendoly	Christopher	W41BC-41	1310 Guilford Ave.	Baltimore	MD	21202	410-547-6753	YES	
Serrano	Salvador	WIAV-58	7501 Greenway Ctr.Dr.#	Greenbelt	MD	20770	301-345-2742	YES	
Serrano	Salvador	WRAV-8	7501 Greenway Ctr.Dr.#	Greenbelt	MD	20770	301-345-2742	YES	5
Peter N.	Cuenca	WCEA-19	911 Massachusetts Ave.	Boston	MS	2118	617-541-2222	YES	
Frenton	Kelly	WMKG-40	4237 Airline Rd.	Muskelon	MI	49444	616-733-4040	YES	
Diana K.	Reinhart	WUPT-49	Box 218	Alpha	MI	49902	906-8753101	YES	
Lealon	Owens	W59CF-59	PO Box 790	Booneville	MS	38829	601-728-6492	YES	
Lealon	Owens	W46CF-46	PO Box 790	Booneville	MS	38829	601-728-6492	YES	
Lealon	Owens	W38BX-38	PO Box 790	Booneville	MS	38829	601-728-6492	YES	
Lealon	Owens	W53AF-53	PO Box 790	Booneville	MS	38829	601-728-6492	YES	
Lealon	Owens	W18BL-18	PO Box 790	Booneville	MS	38829	601-728-6492	YES	34
William	Morgan	W07BN-7	PO Box 453	Bruce	MS	38915	601-983-2801	YES	
David	Ellington	W12CS-12	PO Box 617	Webb	MS	38966	601-375-9291	YES	
David	Ellington	WHCQ-8	PO Box 617	Webb	MS	38966	601-375-9291	YES	15
David	Ellington	WEBU-11	PO Box 617	Webb	MS	38966	601-375-9291	YES	12
Dewey	Sanford	W13CS-13	PO Box 550	Grenada	MS	38902	601-226-1354	YES	3
Gary	Kenny	K09VM-9	PO Box 932	Neosho	MO	34850	417-457-1440	YES	1
Gary	Kenny	KCLJ-46	PO Box 932	Neosho	MO	34850	417-457-1440	YES	10
Gary	Kenny	K32C-32	PO Box 933	Neosho	MO	34850	417-457-1440	YES	10
Gary	Kenny	K38DD-38	PO Box 933	Neosho	MO	34850	417-457-1440	YES	10
Keith	O'Neil	K18EG-18	PO Box 1806	Branson	MO	65615	417-337-8747	YES	
Keith	O'Neil	K25BD-25	PO Box 1806	Branson	MO	65615	417-337-8747	YES	
Keith	O'Neil	K23DU-23	PO Box 1806	Branson	MO	65615	417-337-8747	YES	
Keith	O'Neil	K20CT-20	PO Box 1806	Branson	MO	65615	417-337-8747	YES	
George	Len	K17DL-17	355 Carpenter Dr.	Hollister	MO	65672	417-336-5545	YES	
George	Len	K15CZ-15	355 Carpenter Dr.	Hollister	MO	65672	417-336-5545	YES	4
George	Len	K05SQ-5	355 carpenter Dr.	Hollister	MO	65672	417-336-5545	YES	4
Judy Style	or Richard	KGCS-57	3950 E. Newman Rd.	Joplin	MO	64801	417-625-9375	YES	20
John	Mackerron	WMJE-61	Speech and Mass Comu	towson	MO	21252	410-830-2447	YES	15
Raymond	Karpowicz	K02NQ-2	1 outer Ladue Dr.	St. Louis	MO	63131	317-994-0680	YES	
Scott	Earls	K31DV-31	282 Winter Green Rd.	Branson	MO	65616	417-334-1200	YES	
Richard	Burud	K41EG-41	Hwy 71 South	Jackson	MN	56143	507-847-3520	YES	