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

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In the Matter of	)	
	)	
Advanced Television Systems	)	
and Their Impact upon the	)	MM Docket No. ~~87-267~~ 87-268
Existing Television Broadcast	)	
Service	)	

To: The Commission

CONSOLIDATED PETITION FOR RECONSIDERATION OF
FIFTH REPORT AND ORDER AND SIXTH REPORT AND ORDER
BY
DEPARTMENT OF SPECIAL DISTRICTS,
SAN BERNARDINO COUNTY (CALIFORNIA)

*****

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June 13, 1997

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CONSOLIDATED PETITION FOR RECONSIDERATION OF
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BY
DEPARTMENT OF SPECIAL DISTRICTS,
SAN BERNARDINO COUNTY (CALIFORNIA)

The Department of Special Districts, San Bernardino County (California), "DSD" or "Petitioner," by its attorney, here seeks reconsideration of two actions herein, the Fifth Report and Order, 62 F. Reg. 26996, May 16, 1997 ("5R&O"), and the Sixth Report and Order, 62 F. Reg. 26684, May 14, 1997 ("6R&O"). Petitioner has been active in this proceeding[1] and will continue to participate.

1. Overview.

Upon careful review of the 5R&O and 6R&O, Petitioner finds itself in agreement with the main contours of the Commission's ambitious DTV implementation plan. The Commission has decided that its long-term objective is to repackage the television broadcast service in a core of spectrum. Ultimately that core may run broadly from VHF Channel 2 through UHF Channel 59. Or it may be further restricted to exclude Channels 2 through 6, or Channel 52 through 59, or both these bands. In previous comments we suggested that it will be infeasible to recover Channels 2 through 6, whose value in television broadcasting has been proved over nearly four decades since 1948. On the other hand we take it as a "done deal" that Channels 60 to 69 will not be utilized for

[1] Most recently see "Comments in Response to Sixth Further Notice," November 22, 1996; "Reply Comments," January 24, 1997.

television broadcasting, past the year 2006, or such other transition date as the Commission later may adopt.

Where the Commission's effort shines, and where the staff particularly is to be commended, is in the decision to allot a second channel to each authorized full service broadcaster (in line with Congressional directives), and then in the complex mechanics of seeing to it, so far as possible, that the DTV second channel could fully replicate existing NTSC coverage, if the broadcaster so chose. To an astonishing degree, this intricate design project was brought to a successful conclusion.

Where the Commission's effort faltered was in the near total failure to give any consideration to the needs and interests of rural America. The computer channel selection process for DTV treated existing built-out TV translator systems such as Petitioner's as though they did not exist. As a result, far more damage impends for lifeline rural services than would be the case, had the Commission given any conscious consideration to the rural impact.

At the outer end of the DTV project, the Commission hopes to mandate a complete change-over, phasing out NTSC service and inaugurating a U.S. TV era that is wholly digital. The phase-in occurs in stages, beginning with the largest markets -- a necessary approach where the change agent is private capital. But for the smallest markets, those largely or entirely dependent upon the extended reach of cable television and TV translators, there is as yet no plan. Foreseeably, unless and until rural areas are

needed to implement the remaining parts of the plan. An early election is important to the efficient use of spectrum.

- To make displacement relief effective and efficient, the Commission should broaden its definition of displacement relief, toward a rationed, but broadly unrestricted TV translator and LPTV minor modification approach.
- The Commission should defer action on and Notice of Proposed Rule Making to reallot NTSC channels until all actions in this docket are final and not subject to reconsideration or court review, and until the first wave of DTV activations permits the gathering of operational experience.
- In no event should the Commission reallot channels 60 to 69 until after the transition.
- The Commission should develop a plan for DTV delivery to rural areas.

We turn to the discussion of these specific points.

2. The plan for second-channel recovery should be sharpened, to make clear that a full service broadcaster will have an election to retain either channel, provided the retained channel is in-core. An early election is important to the efficient use of spectrum.

Congress recently extended the license term for television, as "not to exceed" eight years, 47 U.S.C. Sec. 307(c)(1). The Commission has unqualified authority by rule to prescribe a shorter term for any class of stations, Id. In granting a unitary dual license, pursuant to a minor change, the recent actions do not appear to have focused on the fact that, consistently with the 2006 date for channel reversion and switchover, licenses can and should have express give-back conditions attached, beginning with renewals granted on or about January 1, 1998, or less than six months from now.

The Commission is mandated by Congress to impose a license condition for the second licensed channels, 47 U.S.C. Sec. 336(c).

Such condition should appear on the face of the instrument, in all renewals granted after the first of the year, 1998. By then, the 90-day election period (5R&O, ¶70) will have passed, and the precise names and total number of licensees acceding to the second channel offered them will be known with certainty. Of course the imposition of an express condition in no way will impair the Commission's ability, through its biennial reviews and other rule making, to fashion appropriate public interest adjustments, including appropriate extensions to the switchover and give-back target dates.

So far the Commission is taking the position that the licensee may claim permanent rights either in its old channel or in its new one, but that the choice will be automatic, if one channel is outside the core and hence, by definition, impermanent. Yet the Commission has not come to a final determination of what the core channels are. This suggests that finality on what constitutes the core needs to be decided, relatively, at an early date.

A final determination of the metes and bounds of the core has the additional public interest benefit that licensees will know, and be able to plan toward whatever conversion will be required. Those needing to move not once, but twice, will have the maximum time to make their plans. The selection of the core for purposes of this proceeding should not be tied to a reallotment of the non-core channels. There will be time enough to pursue the re-farming of the non-core, after the business at hand is gotten safely

underway with the minimum of disruption.

Once the core is identified, and the licensees' range of choice, or lack of choice, becomes more clear, it will be possible for Petitioner, other TV translator users, LPTV users, and others to make their plans, against a stable background of channel usage. By contrast, continued uncertainty as to which channels will revert makes it difficult to design facilities that will not continue to be displaced again and again, even during the transition.

3. To make displacement relief effective and efficient, the Commission should broaden its definition of displacement, and move toward a rationed, but broadly unrestricted TV translator and LPTV minor modification approach.

Responding to numerous comments from translator and LPTV operators, the Commission has decided to allow translator and LPTV operators to apply for major changes to change channel and even increase power, to preserve existing services that will be affected by the new DTV service coming on, 6R&O, ¶144 and fn. 263. Petitioner does not minimize the value and importance of this step. Nevertheless, the approach needs to be refined in key respects.

The Commission has not stated what would constitute a sufficient threshold showing of displacement. Petitioner submits that the Commission should state that it will entertain any reasonable showing. The adoption of the DTV Table, Appendix E to 6R&O itself evidences displacement for the affected channels and

communities, because virtually all incumbent full service broadcasters are expected to confirm their acceptance of the second channel, and because allotments not claimed will remain on the books for early use by those not in the rolls of the initially eligible. From Petitioner's viewpoint, there is no reasonable likelihood that any Los Angeles station will forego its second channel, and the dual operation in Los Angeles will come, under Commission directives, sooner not later. The Commission should clarify that an interference relationship with any allotted DTV channel in the new Sec. 73.622 of the Rules, without more, will satisfy the needed showing for displacement relief.

There will be many instances where relief is needed, not for a single interference case, but for the re-design of a multi-channel system. Referring to Exhibit 1 herewith, Petitioner operates a multi-channel translator system on Elephant Mountain (Daggett) near Barstow. The close channel relationship of Channels 35, 39, 41, and 44 makes it possible for all these facilities to transmit with a common antenna. The addition of DTV Channel 44 at Barstow -- as now has happened -- obviously will negate future use of Channel 44. But, in the event that channels can be found, displacement relief may be appropriate to migrate more than one licensed translator into a new channel grouping with a new common antenna. The alternative is loss of service, or greatly added expense in re-tooling.

Continuing with the Daggett example, Channels 61, 67 and 69 currently are operational from Elephant Mountain. It is obvious

that the reallotment of these channels will have a devastating effect on any plan of Petitioner to continue to provide local television service, even during the transition.[2] But if the Commission unwisely continues with its plan for early recovery of Channels 60 to 69, it should take the occasion of this reconsideration to find that any TV translator located in that band already has established per se entitlement to displacement relief.

Even a casual examination of Exhibit 1 should establish that translator systems such as Petitioner's are likely to be substantially disfigured or destroyed during the transition. The general concept of a showing of need for displacement suggests that such need is the exceptional case. With multiple channel systems, such need is likely to be the norm. The Commission should move toward a system of unrestricted channel modifications for the TV translator and LPTV services as a whole, throughout the transition.

In retaining the overriding concept of a general freeze on translator filings, the Commission appears still to be reacting to the filing avalanche that greeted the advent of low power television, after the adoption of the Notice of Proposed Rule

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[2] In this proceeding our sister County of Los Angeles "argues that elimination of channels 60-69 would have minimal impact on current television broadcasters." 6R&O, ¶67. This "argument" would come as a surprise to the Los Angeles stations that have consented to Petitioner's rebroadcasts of their signals for decades, and have included San Bernardino locations in their service areas and rate cards.

Making on September 9, 1980. Initially the Agency did not impose a freeze. The initial filing deadline was extended until February 17, 1991. By then 3,100 applications were filed, including 1,300 on the final day. Another filing cutoff was announced for March 31, 1991, and another 5,000 applications poured in. On April 9, 1981, a total freeze was imposed, and with slight modification it continues to this date -- more than 16 years later.

It took the Commission approximately six years to work through the backlog created within the span of six months in 1980-1981. That woeful experience appears still to be driving the approach. But today, with a pressing, nation-wide need for displacement relief on the horizon, the time is past due for another look. Two important safeguards are present today that were absent during the 1981 avalanche: a limit of five applications in any window, and an application filing fee. The original crises might have been averted by 70 to 80 per cent or more, had these safeguards then been in place.

In the coming few years, it would be no less than a scandal if the Commission's plan forces the destruction of existing service, and the licensees have no bureaucratic solution at hand. Displacement showings must be handled on an individual basis, and themselves impose an administrative resource impact. The Commission's plan raises at least the grim possibility that a new backlog will arise, forcing rural stations to go dark while their displacement applications are pending. Further, in the nature of the phased rollout, it is not hard to imagine a need for

displacement relief at the same facility, two, three, four or five times over the coming decade.

Petitioner's preferred solution for existing translator and LPTV permittees and licensees, would be to treat all facilities changes that are compliant with the new power and separation requirements as **minor changes**. Displacement relief showings would be dispensed with. To receive consideration as a minor change, an application would need to include an engineering certification, to show that a frequency study had been performed and that the change otherwise was in full compliance. This could be done with a series of "checked blocks" analogous those being utilized for full service DTV applications, Appendix D to 5R&O.

Because LPTV's and TV translator are secondary services, any new interference at the changed facility would have to be corrected immediately or the licensee would be required to cease operation, as now. Secondary status makes the case for use of minor change and a checkoff system at least as persuasive as the case for treating new DTV authorizations, similarly, as minor changes, 5R&O, ¶74.

There may indeed be an underlying "avalanche phobia" that deters the Commission even now from fashioning needed relief. But unless an effective safety valve system is created, the Commission is likely to be overwhelmed with emergency requests for Special Temporary Authorization, which of course need to be examined and processed by skilled personnel on an individual basis. The administrative concern is best addressed by phasing in and testing

a minor change approach. For example, initially, change applications could be limited to five per calendar year per applicant. Or a test could be run for a selection of states or markets, and if the approach proves manageable, could be broadened in stages.

The Commission cannot reasonably or rationally aver that the DTV implementation imposes impacts on TV translators and LPTV that are minor and acceptable, and at the same time conclude that it lacks the resources to process the cascading waves of paper generated by licensees whose services will be threatened with destruction by the Commission's actions. The way out of this dilemma is to accord the licensees maximum flexibility to adapt and to adapt again, taking full advantage of the flexibility inherent in secondary, non-interfering status.

4 The Commission should defer action on and Notice of Proposed Rule Making to reallot NTSC channels until all actions in this docket are final and not subject to reconsideration or court review, and until the first wave of DTV activations permits the gathering of operational experience.

The 6R&O states that a proceeding will be launched in the "very near future" (¶80) to address how to allocate Channels 60 to 69. The Commission recently indicated that it would "give serious consideration" to reallocating 24 MHz for public safety uses, and will consider whether some or all of the remaining 36 MHz could be assigned by auction. Petitioner submits that these observations pre-judge any such future rule making, and should be withdrawn.

We have advocated above that the Commission reach a prompt determination of what channels will be considered "core." This a

long range planning issue that affects every full service licensee having a second channel or both channel "out of core." And it has ripple effects for secondary licensees attempting to stabilize facilities in a fluid situation with, eventually, some 1600 new full service TV activation.

In our view, it does not follow that reallocation proceedings would be appropriately initiated at this time. The DTV channelization plan will not be finalized until reconsideration petitions are acted upon and, possibly, until the entire matter has been further ventilated in the Courts of Appeal. Only then will the channel requirements for DTV be initially set, so that the tradeoffs in reallotting none, some or all of these bands can be intelligibly discussed, and wise proposals formulated.

The early build out requirements in major cities also yields operational experience with DTV transmissions that will be far more instructive than the limited testing undertaken to this date, in Charlotte, N.C. Full service TV dual licensees should be expressly permitted, indeed encouraged where it is possible, to switch DTV into their NTSC plant, during off hours or with suitable announcements, for purposes of experimentation and testing. The results of such tests quickly will come to supersede the isolated estimates that to this date have prompted the Commission to assume that Channels 2 through 6 are poorly suited for DTV operations. Such tests also will show with precision such coverage and other differences as exist in fact, for DTV services up and down the UHF band. To propose the reallotment from

broadcasting of channel groups, without knowing from experience which channels are best for DTV broadcasting would border on the irresponsible.

So long as existing NTSC services are grandfathered, a reallotment of 24 MHz in Channels 60 to 69 lacks practical meaning in the largest markets until after the transition. In smaller markets such as Petitioner's, the Commission lacks probative evidence of any urgent unfilled need for public safety spectrum. With respect to the prospect of auctions, delay will amply reward the United States Government. During the past four years, the Commission has flooded the market with auctioned spectrum, prices generally are depressed any many authorized facilities have not yet been constructed.[3] A sensible hiatus would well serve the Government and the taxpayer. In the end, no rational basis has been suggested for a rush to allotment judgment.

5. In no event should the Commission reallot channels 60 to 69 until after the transition.

In the 6R&O the Commission states,

> With regard to LPTV and TV translator stations, we continue to believe that the principal impact on low power operations will be from the accommodation of all full service broadcasters with a second channel for DTV.

6R&O, ¶81, i.e. and not from the reallocation of Channels 60 to 69. With respect, the continuance of this "belief" is based on nothing more than bald ignorance of rural TV translator and LPTV

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[3] Mark Landler, "Airwave Auctions Falter as Source of Funds for U.S.," New York Times, April 3, 1997, page one.

operations. Petitioner previously stated in Comments here that the numerous Los Angeles stations are too far distance for their second DTV channels to have preclusive effect on existing County TV translator operations. Here and there, as with the new DTV Channel 44 in Barstow mentioned previously, there will be an impact. But referring to Exhibit 1, loss of the Channels 60 to 69 would destroy existing TV broadcast service at Daggett on Channels 61, 67, and 69; at Joshua Tree on Channel 61; at Lucerne Valley, on Channel 68; at Morongo Valley on Channels 60, 62, 64, and 67; at Twentynine Palms, on Channels 63, 65, and 67 -- a total of 12 channels.

Petitioner is not aware of any evidence, in the record, anecdotal, or other evidence, of unmet public safety spectrum needs in these communities. With respect to the plans for auction, it is a truism that auctions fetch smaller bids as we move downward from the largest markets. The Commission's apparent plan could effect the destruction of local television service, with no known countervailing benefit. To the degree that tax-created and supported facilities are disabled, merely to garner the small amounts that these rural areas could fetch at auction, there is a question a basic fairness.

Petitioner's assumption is that such TV translator services as survive the transition will be able to continue to provide public service after the transition, when the reversion opens hundreds of new channels again. The crux of the issue is whether the Commission, hearing a clamor for major market spectrum, should

extinguish rural television service now without a care, even when its proposals will do little to free up major market channels during the transition.

Finally, if the Commission unwisely decides to reallocate Channels 60 to 69 during the transition, it could sensibly limit this relief to the only areas with a proved need, for example the five largest markets. Specifically with respect to land mobile protection, there is as yet no record of a need for channel protection, beyond, let us say, 50 km of a Census-defined Metro County. Petitioner recognizes that some of these considerations are best taken up in a future allotment rule making. For present purposes, Petitioner's complaint is that the Commission appears inappropriately to have pre-judged some of those issues in the present proceeding. Petitioner urges that these decisions be deferred *in toto*, for the appropriate time and place, where it pledges to participate again and share such knowledge as it possesses. Petitioner urges that the Commission's present aspirational language in this area be reconsidered, and withdrawn.

6 The Commission should develop a plan for DTV delivery to rural areas.

It is fair to ask, what is the Commission's plan for DTV service delivery to rural areas that are dependent on traditional TV translator services? Good examples are found in Exhibit 2 herewith: the communities of Duncan, Arizona; Inyokern, California; Cortez, Colorado; Granite Falls, Minnesota; and

LaGrande, Oregon. These locations are at or near full channel capacity, and may stand to lose one or two channels as the result of DTV allotments coming on in distant markets. The additional loss of Channels 60 to 69 in many cases would be far more severe, indeed devastating. Obviously, and even assuming the technology were affordable and available, these community TV operators are not going to be able to double their systems and simulcast NTSC and DTV at any time during the transition.

This issue has major significance for the DTV rollout, and particularly for the intended complete switchover. If many rural areas remain hopelessly unable to pass a DTV signal throughout the transition, their residents (and their elected representatives) cannot be expected to tolerate a "lights out" by a date certain for NTSC television. Their numbers may be small -- perhaps no more than two to four million citizens. But if their needs continue to be ignored by the Commission, they may be the gnat that sinks the DTV elephant. These areas have a history of extra-legal operations, and should the government fail to accommodate them, the writ of the United States will never make them change to DTV. Petitioner, an instrumentality of County government, must conduct itself within the law. Others will not be so constrained.

The Commission has stated that it will "defer to a future proceeding matters relating to the general authorization of digital television by low power and TV translator stations." 6R&O, ¶147. With all the Commission had on its plate here, that is perhaps understandable. Petitioner recommends, however, that the

Commission take care to assure that TV translators will be authorized to rebroadcast NTSC or DTV channels with permission, and to originate NTSC and DTV, as their public interest judgment informs them and as market forces induce them, without restriction, at the earliest possible date.

If this can be decided here, at reconsideration, it will have the added benefit of enabling full service stations to begin now to supplement their coverage design with DTV translators. Because coverage is required only to the principal community, this may create a cost-effective and innovative way for primary stations to serve larger markets, and promote the efficient development of DTV service overall.

7. Conclusion.

For the reasons set forth, Petitioner requests that the Commission reconsider the Fifth Report and Order and Sixth Report and Order, in light of the considerations here expressed.

Respectfully submitted,

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San Bernardino County (California)

June 13, 1997

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Exhibit No. 1.

FACILITIES OPERATED BY OR IN COOPERATION WITH DEPARTMENT OF SPECIAL DISTRICTS SAN BERNARDINO COUNTY (CALIFORNIA)

APP 15	K15BZ	CA	DAGGETT	COUNTY OF SAN BERNARDINO, AREA 40
LIC 19	K19BS	CA	DAGGETT	COUNTY OF SAN BERNARDINO, AREA 40
LIC 41	K41CY	CA	DAGGETT	COUNTY OF SAN BERNARDINO, AREA 40
LIC 61	K61AE	CA	DAGGETT	COUNTY OF SAN BERNARDINO, AREA 40
LIC 69	K69FJ	CA	DAGGETT	COUNTY OF SAN BERNARDINO, AREA 40
LIC 23	K23BP	CA	DAGGETT, ETC.	COUNTY OF SAN BERNARDINO, AREA 40
LIC 35	K35BQ	CA	DAGGETT, ETC.	COUNTY OF SAN BERNARDINO, AREA 40
LIC 39	K39DW	CA	DAGGETT, ETC.	COUNTY OF SAN BERNARDINO, AREA 40
LIC 44	K44DV	CA	DAGGETT, ETC.	COUNTY OF SAN BERNARDINO, AREA 40
LIC 67	K67AZ	CA	DAGGETT, ETC.	COUNTY OF SAN BERNARDINO, AREA 40
LIC 17	KTSK-LP	CA	DAGGETT, ETC.	COUNTY OF SAN BERNARDINO, AREA 40
LIC 57	K57EV	CA	JOSHUA TREE	MORONGO BASIN TV CLUB, INC.
LIC 10	K10LK	CA	JOSHUA TREE, ETC.	MORONGO BASIN TV CLUB, INC.
LIC 12	K12MG	CA	JOSHUA TREE, ETC.	MORONGO BASIN TV CLUB, INC.
LIC 59	K59BM	CA	JOSHUA TREE, ETC.	MORONGO BASIN TV CLUB, INC.
LIC 61	K61BE	CA	JOSHUA TREE, ETC.	MORONGO BASIN TV CLUB, INC.
APP 15	K15CA	CA	LUCERNE VALLEY	COUNTY OF SAN BERNARDINO, AREA 29
LIC 19	K19BT	CA	LUCERNE VALLEY	COUNTY OF SAN BERNARDINO, AREA 29
LIC 33	K33DK	CA	LUCERNE VALLEY	COUNTY OF SAN BERNARDINO, AREA 29
LIC 41	K41CB	CA	LUCERNE VALLEY	COUNTY OF SAN BERNARDINO, AREA 29
LIC 43	K43EE	CA	LUCERNE VALLEY	COUNTY OF SAN BERNARDINO, AREA 29
LIC 48	K48AD	CA	LUCERNE VALLEY	COUNTY OF SAN BERNARDINO, AREA 29

LIC 50 K50EW CA LUCERNE VALLEY COUNTY OF SAN BERNARDINO AREA 29
CP 54 K54AD CA LUCERNE VALLEY COUNTY OF SAN BERNARDINO, AREA 29
LIC 68 K68CW CA LUCERNE VALLEY COUNTY OF SAN BERNARDINO, AREA 29

LIC 13 K13WJ CA MORONGO VALLEY COUNTY OF SAN BERNARDINO, AREA 70
LIC 14 K14AB CA MORONGO VALLEY COUNTY OF SAN BERNARDINO, AREA 70
LIC 16 K16AA CA MORONGO VALLEY COUNTY OF SAN BERNARDINO, AREA 70
LIC 32 K32EM CA MORONGO VALLEY COUNTY OF SAN BERNARDINO AREA 70
CP 34 K34EU CA MORONGO VALLEY COUNTY OF SAN BERNARDINO AREA 70
CP 48 K48EM CA MORONGO VALLEY COUNTY OF SAN BERNARDINO, AREA 70
LIC 60 K60AY CA MORONGO VALLEY COUNTY OF SAN BERNARDINO, AREA 70
LIC 62 K62AO CA MORONGO VALLEY COUNTY OF SAN BERNARDINO, AREA 70
LIC 64 K64AU CA MORONGO VALLEY COUNTY OF SAN BERNARDINO, AREA 70
LIC 67 K67BH CA MORONGO VALLEY COUNTY OF SAN BERNARDINO, AREA 70

LIC 03 K03EK CA NEWBERRY SPRINGS COUNTY OF SAN BERNARDINO, AREA 40
LIC 06 K06IQ CA NEWBERRY SPRINGS COUNTY OF SAN BERNARDINO, AREA 40
LIC 08 K08IA CA NEWBERRY SPRINGS COUNTY OF SAN BERNARDINO, AREA 40
LIC 10 K10IX CA NEWBERRY SPRINGS COUNTY OF SAN BERNARDINO, AREA 40
LIC 12 K12JI CA NEWBERRY SPRINGS COUNTY OF SAN BERNARDINO, AREA 40

APP 14 K10LK CA TWENTYNINE PALMS MORONGO BASIN TV CLUB, INC.
APP 18 K12MG CA TWENTYNINE PALMS MORONGO BASIN TV CLUB, INC.
LIC 51 K51DU CA TWENTYNINE PALMS, ET MORONGO BASIN TV CLUB, INC.
LIC 49 K49DC CA TWENTYNINE PALMS,ETC MORONGO BASIN TV CLUB, INC.
LIC 54 K54AI CA TWENTYNINE PALMS,ETC MORONGO BASIN TV CLUB, INC.
LIC 63 K63CG CA TWENTYNINE PALMS,ETC MORONGO BASIN TV CLUB, INC.
LIC 65 K65AR CA TWENTYNINE PALMS,ETC MORONGO BASIN TV CLUB, INC.
LIC 67 K67AJ CA TWENTYNINE PALMS,ETC MORONGO BASIN TV CLUB.

Exhibit No. 2

ILLUSTRATIVE MULTI-CHANNEL TRANSLATOR AND LPTV LOADINGS
(NAMED COMMUNITY ONLY)

Note: Market ranks are taken from the Commission's Television Channel Utilization, as of December 31, 1996, released on April 3, 1997. "No Market" means that there are no full service TV stations licensed to that community.

1. Fairbanks, Alaska 205th Market

LIC 14	K14JL	AK	FAIRBANKS	GOLDBELT, INC.
LIC 16	K16DW	AK	FAIRBANKS	GOLDBELT, INC.
LIC 18	K18ED	AK	FAIRBANKS	GREENTV CORP.
LIC 20	K20FF	AK	FAIRBANKS	GOLDBELT, INC.
LIC 22	K22EY	AK	FAIRBANKS	GOLDBELT, INC.
LIC 24	K24EG	AK	FAIRBANKS	GOLDBELT, INC.
LIC 26	K26EL	AK	FAIRBANKS	GOLDBELT, INC.
LIC 28	K28ES	AK	FAIRBANKS	GOLDBELT, INC.
LIC 30	K30ET	AK	FAIRBANKS	GOLDBELT, INC.
LIC 34	K34EJ	AK	FAIRBANKS	GOLDBELT, INC.
LIC 36	K36ED	AK	FAIRBANKS	GOLDBELT, INC.
LIC 38	K38EL	AK	FAIRBANKS	GOLDBELT, INC.
LIC 40	K40EN	AK	FAIRBANKS	GOLDBELT, INC.
LIC 42	K42EC	AK	FAIRBANKS	GOLDBELT, INC.
LIC 44	K44EK	AK	FAIRBANKS	GOLDBELT, INC.
LIC 46	K46EH	AK	FAIRBANKS	GOLDBELT, INC.
LIC 48	K48FG	AK	FAIRBANKS	GOLDBELT, INC.
LIC 50	K50EH	AK	FAIRBANKS	GOLDBELT, INC.
LIC 52	K52EY	AK	FAIRBANKS	GOLDBELT, INC.
LIC 54	K54EW	AK	FAIRBANKS	GOLDBELT, INC.
LIC 56	K56FX	AK	FAIRBANKS	GOLDBELT, INC.
LIC 60	K60FQ	AK	FAIRBANKS	GOLDBELT, INC.
LIC 62	K62FB	AK	FAIRBANKS	GOLDBELT, INC.
LIC 64	K64EU	AK	FAIRBANKS	GOLDBELT, INC.
LIC 66	K66FG	AK	FAIRBANKS	GOLDBELT, INC.
LIC 68	K68EZ	AK	FAIRBANKS	GOLDBELT, INC.
LIC 13	K13XD	AK	FAIRBANKS	TANANA VALLEY TELEVISION COMPANY

2. *El Dorado, Arkansas* _____ 133rd Market

LIC 20	K20DP	AR	EL DORADO	LOUISIANA CHRISTIAN B/CASTING, INC.
CP 05	K05KG	AR	EL DORADO	IMMANUEL BAPTIST CHURCH
LIC 23	K23EP	AR	EL DORADO	LOUISIANA CHRISTIAN B/CASTING, INC.
CP 18	K18AB	AR	EL DORADO	NOE ENTERPRISES, INC.
LIC 27	K27FF	AR	EL DORADO	PAUL M. AND ROSE B. PARKS
CP 29	K29DC	AR	EL DORADO	DOUGLAS WOELLNER
APP 36	K36DR	AR	EL DORADO	RICHARD E. MURRAY
CP 36	K36DR	AR	EL DORADO	RICHARD E. MURRAY
APP 40	K40EF	AR	EL DORADO	DALE E. PAINTER
CP 46	K46DT	AR	EL DORADO	NORMAN D. TANNER
CP 46	K46DT	AR	EL DORADO	NORMAN D. TANNER
APP 48	K48EP	AR	EL DORADO	MALCOLM C. COOK, SR.
CP 50	K50EK	AR	EL DORADO	SIMIE FEIN
CP 50	K50EK	AR	EL DORADO	SIMIE FEIN
APP 53	K53FB	AR	EL DORADO	MALCOLM C. COOK, SR.
CP 53	K53FB	AR	EL DORADO	MALCOLM C. COOK, SR.
APP 57	K57GF	AR	EL DORADO	DAN LEWIS
CP 57	K57GF	AR	EL DORADO	DAN LEWIS
APP 59	K59FJ	AR	EL DORADO	DAN LEWIS
CP 59	K59FJ	AR	EL DORADO	DAN LEWIS
APP 63	K63FX	AR	EL DORADO	MARK SILBERMAN
CP 66	K66EX	AR	EL DORADO	DAMON MERARI
CP 66	K66EX	AR	EL DORADO	DAMON MERARI
APP 69	K69HO	AR	EL DORADO	JOSEPH LISKA, JR.
CP 29	K29DC	AR	EL DORADO	DOUGLAS WOELLNER

3. *Duncan, Arizona* _____ No Market

CP 23	K23CK	AZ	DUNCAN	ARIZONA BOARD OF REGENTS
LIC 43	K43CN	AZ	DUNCAN	SOUTHERN GREENLEE COUNTY TV ASSN,IN
LIC 47	K47DA	AZ	DUNCAN	SOUTHERN GREENLEE COUNTY TV ASSN,IN
LIC 49	K49CH	AZ	DUNCAN	SOUTHERN GREENLEE COUNTY TV ASSN,IN
LIC 51	K51DG	AZ	DUNCAN	SOUTHERN GREENLEE COUNTY TV ASSN,IN
LIC 53	K53DL	AZ	DUNCAN	SOUTHERN GREENLEE COUNTY TV ASSN,IN
LIC 17	K17CM	AZ	DUNCAN, ETC.	GOSPEL LIGHT BROADCASTING, INC.
LIC 33	K33DA	AZ	DUNCAN, ETC.	SOUTHERN GREENLEE COUNTY TV ASSN,IN
LIC 35	K35CP	AZ	DUNCAN, ETC.	SOUTHERN GREENLEE COUNTY TV ASSN,IN
LIC 39	K39CM	AZ	DUNCAN, ETC.	SOUTHERN GREENLEE COUNTY

TV ASSN,IN
LIC 41 K41CV AZ DUNCAN, ETC. SOUTHERN GREENLEE COUNTY TV ASSN,IN
LIC 55 K55DM AZ DUNCAN, ETC. SOUTHERN GREENLEE COUNTY TV ASSN,IN
LIC 57 K57CU AZ DUNCAN, ETC. SOUTHERN GREENLEE COUNTY TV ASSN,IN
LIC 65 K65CM AZ DUNCAN, ETC. SOUTHERN GREENLEE COUNTY TV ASSN,IN
LIC 67 K67CP AZ DUNCAN, ETC. SOUTHERN GREENLEE COUNTY TV ASSN,IN
LIC 69 K69DG AZ DUNCAN, ETC. SOUTHERN GREENLEE COUNTY TV ASSN,IN

4. Inyokern, California _____ No Market

LIC 47 K47AE CA INYOKERN, ETC. INDIAN WELLS VALLEY TV BOOSTER, INC
LIC 49 K49AA CA INYOKERN, ETC. INDIAN WELLS VALLEY TV BOOSTER, INC
LIC 53 K53AB CA INYOKERN, ETC. INDIAN WELLS VALLEY TV BOOSTER, INC
LIC 57 K57AK CA INYOKERN, ETC. INDIAN WELLS VALLEY TV BOOSTER, INC
LIC 59 K59AO CA INYOKERN, ETC. INDIAN WELLS VALLEY TV BOOSTER, INC
LIC 61 K61AJ CA INYOKERN, ETC. INDIAN WELLS VALLEY TV BOOSTER, INC
LIC 63 K63AH CA INYOKERN, ETC. INDIAN WELLS VALLEY TV BOOSTER, INC
LIC 65 K65AM CA INYOKERN, ETC. INDIAN WELLS VALLEY TV BOOSTER, INC
LIC 67 K67AO CA INYOKERN, ETC. INDIAN WELLS VALLEY TV BOOSTER, INC
LIC 69 K69AS CA INYOKERN, ETC. INDIAN WELLS VALLEY TV BOOSTER, INC

5. Cortez, Colorado _____ No Market

LIC 53 K53DR CO CORTEZ KOB-TV, INC.
LIC 06 K06JF CO CORTEZ NEW MEXICO BROADCASTING COMPANY, IN
LIC 33 K33AE CO CORTEZ SOUTHWEST COLORADO TV TRANS. ASSOC.
LIC 59 K59CF CO CORTEZ SOUTHWEST COLORADO TV TRANS. ASSOC.
LIC 14 K08MI CO CORTEZ & MANCOS SOUTHWEST COLORADO TV TRANSLATOR AS
CP 62 K10OE CO CORTEZ & MANCOS SOUTHWEST COLORADO TV

TRANSLATOR AS
APP 62 K06JF CO CORTEZ, ETC. NEW MEXICO BROADCASTING
COMPANY, IN
APP 11 K11LP CO CORTEZ, ETC. SOUTHWEST COLORADO TV
TRANS. ASSOC.
LIC 07 K07UY CO CORTEZ, ETC. SOUTHWEST COLORADO TV
TRANS. ASSOC.
LIC 09 K09DM CO CORTEZ, ETC. SOUTHWEST COLORADO TV
TRANS. ASSOC.
LIC 16 K16CT CO CORTEZ, ETC. SOUTHWEST COLORADO TV
TRANSLATOR
LIC 18 K18DR CO CORTEZ, ETC. SOUTHWEST COLORADO TV
TRANS. ASSOC.
LIC 20 K20DI CO CORTEZ, ETC. S.W. COLORADO TV
TRANSLATOR ASSOCIA
LIC 22 K22CU CO CORTEZ, ETC. SOUTHWEST COLORADO TV
TRANS. ASSOC.
LIC 28 K28EB CO CORTEZ, ETC. SOUTHWEST COLORADO TV
TRANS. ASSOC.
CP 41 K41DE CO CORTEZ, ETC. SAN JUAN BASIN AREA
VOCATIONAL-TECH
LIC 51 K51DB CO CORTEZ, ETC. SOUTHWEST COLORADO TV
TRANS. ASSOC.
LIC 57 K57EX CO CORTEZ, ETC. SOUTHWEST COLORADO TV
TRANS. ASSOC.
LIC 35 K35CH CO CORTEZ, MANCOS, ETC. SOUTHWEST COLORADO TV
TRANS. ASSOC.
LIC 64 K64FF CO CORTEZ-RED MESA UNIVERSITY OF SOUTHERN
COLORADO

6. Granite Falls, Minnesota _____ No Market

LIC 16 K16CP MN GRANITE FALLS MINNESOTA VALLEY TV
IMPROVEMENT COR
LIC 18 K18DI MN GRANITE FALLS MINNESOTA VALLEY TV
IMPROVEMENT COR
LIC 22 K22DO MN GRANITE FALLS MINNESOTA VALLEY TV
IMPROVEMENT COR
LIC 24 K24CS MN GRANITE FALLS MINNESOTA VALLEY TV
IMPROVEMENT COR
LIC 26 K26DG MN GRANITE FALLS MINNESOTA VALLEY TV
IMPROVEMENT COR
LIC 32 K32DR MN GRANITE FALLS MINNESOTA VALLEY TV
IMPROVEMENT COR
LIC 35 K35DK MN GRANITE FALLS MINNESOTA VALLEY TV
IMPROVEMENT COR
LIC 45 K45DJ MN GRANITE FALLS MINNESOTA VALLEY TV
IMPROVEMENT COR
LIC 47 K47EA MN GRANITE FALLS MINNESOTA VALLEY TV
IMPROVEMENT COR
LIC 59 K59BE MN GRANITE FALLS MINNESOTA VALLEY TV
IMPROVEMENT COR
LIC 61 K61AU MN GRANITE FALLS MINNESOTA VALLEY TV

IMPROVEMENT COR
LIC 63 K63AU MN GRANITE FALLS MINNESOTA VALLEY TV
IMPROVEMENT COR
LIC 65 K65BA MN GRANITE FALLS MINNESOTA VALLEY TV
IMPROVEMENT COR
LIC 67 K67AN MN GRANITE FALLS MINNESOTA VALLEY TV
IMPROVEMENT COR
LIC 69 K69DP MN GRANITE FALLS MINNESOTA VALLEY TV
IMPROVEMENT COR

7. La Grande, Oregon _____ 24th Market

LIC 34 K34DI OR LA GRANDE BLUE MOUNTAIN TRANSLATOR
DISTRICT
LIC 07 K07WD OR LA GRANDE LA GRANDE 7TH DAY
ADVENTIST CHURCH
LIC 18 K18FA OR LA GRANDE BLUE MTN. TRANSLATOR
DISTRICT
CP 20 K20EY OR LA GRANDE BLUE MTN. TRANSLATOR
DISTRICT
CP 23 K23DB OR LA GRANDE CANNELL COMMUNICATIONS,
INC.
LIC 33 K18FA OR LA GRANDE BLUE MTN. TRANSLATOR
DISTRICT
APP 20 K20EY OR LA GRANDE BLUE MTN. TRANSLATOR
DISTRICT
APP 29 K39EG OR LA GRANDE BLUE MTN. TRANSLATOR
DISTRICT
APP 39 K52DT OR LA GRANDE BLUE MOUNTAIN TRANSLATOR
DISTRICT
APP 26 K54BX OR LA GRANDE BLUE MOUNTAIN TRANSLATOR
DISTRICT
APP 56 K56BE OR LA GRANDE BLUE MOUNTAIN TRANSLATOR
DISTRICT
APP 58 K58AY OR LA GRANDE BLUE MOUNTAIN TRANSLATOR
DISTRICT
APP 39 K39EG OR LA GRANDE BLUE MTN. TRANSLATOR
DISTRICT
CP 50 K50CI OR LA GRANDE BLUE MOUNTAIN TRANSLATOR
DISTRICT
LIC 52 K52DT OR LA GRANDE BLUE MOUNTAIN TRANSLATOR
DISTRICT
LIC 54 K54BX OR LA GRANDE BLUE MOUNTAIN TRANSLATOR
DISTRICT
LIC 56 K56BE OR LA GRANDE BLUE MOUNTAIN TRANSLATOR
DISTRICT
LIC 58 K58AY OR LA GRANDE BLUE MOUNTAIN TRANSLATOR
DISTRICT
LIC 64 K64BB OR LA GRANDE, ETC BLUE MOUNTAIN TELEVISION
ASSOCIATIO
LIC 60 K60DL OR LA GRANDE, ETC. BLUE MOUNTAIN TRANSLATOR
DISTRICT

LIC 19	K19DC	TX	SAN ANTONIO	SAN ANTONIO BROADCASTING CORPORATIO
LIC 21	K21DZ	TX	SAN ANTONIO	HUMBERTO LOPEZ
CP 39	K39DX	TX	SAN ANTONIO	HYE CHIN LOWERY
APP 68	K68EI	TX	SAN ANTONIO	ARACELIS ORTIZ
CP 15	NEW-T	TX	SAN ANTONIO	LOUIS MARTINEZ
APP 07	K07WS	TX	SAN ANTONIO	MAYFIELD CHRISTIAN TV STUDIO INC.
CP 64	K64EL	TX	SAN ANTONIO	CLARK ORTIZ
CP 57	K57GO	TX	SAN ANTONIO	GONZALO A. SANTOS
CP 02	K02MX	TX	SAN ANTONIO	SAN ANTONIO CHANNEL 2, INC.
LIC 52	K52EA	TX	SAN ANTONIO	ARACELIS ORTIZ
LIC 54	K52EA	TX	SAN ANTONIO	ARACELIS ORTIZ
APP 67	K67DW	TX	SAN ANTONIO	LAS VEGAS MEDIA, LLC
LIC 27	K27EA	TX	SAN ANTONIO	JOSEPH W. SHAFFER
APP 17	K17BY	TX	SAN ANTONIO	NICOLAS COMMUNICATIONS CORPORATION
LIC 17	K17BY	TX	SAN ANTONIO	NICOLAS COMMUNICATIONS CORPORATION
CP 15	K15CC	TX	SAN ANTONIO	GWENDOLYN MAY
CP 31	K31EX	TX	SAN ANTONIO	HYE CHIN LOWERY
CP 48	K48DS	TX	SAN ANTONIO	SAN ANTONIO COLLEGE
LIC 65	K65ES	TX	SAN ANTONIO	LOUIS MARTINEZ
APP 65	K65ES	TX	SAN ANTONIO	LOUIS MARTINEZ
CP 20	K20BW	TX	SAN ANTONIO	TCCSA/DBA TRINITY B/CASTING NETWORK
LIC 20	K20BW	TX	SAN ANTONIO	TCCSA/DBA TRINITY B/CASTING NETWORK
APP 58	K58EU	TX	SAN ANTONIO	E. CABALLERO & R. CABALLERO-STAFFOR
CP 63	K64EL	TX	SAN ANTONIO	CLARK ORTIZ
APP 68	K68EI	TX	SAN ANTONIO	ARACELIS ORTIZ
APP 47	KDWZ-LP	TX	SAN ANTONIO	LAS VEGAS MEDIA, LLC
APP 25	K25ES	TX	SAN ANTONIO	KEVIN ORTIZ
CP 25	K25ES	TX	SAN ANTONIO	KEVIN ORTIZ
APP 25	K25ES	TX	SAN ANTONIO	KEVIN ORTIZ
LIC 33	K33CK	TX	SAN ANTONIO	TCCSA/DBA TRINITY B/CASTING NETWORK
LIC 33	K33CK	TX	SAN ANTONIO	TCCSA/DBA TRINITY B/CASTING NETWORK
CP 27	K27EA	TX	SAN ANTONIO	JOSEPH W. SHAFFER

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