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OFFICE OF THE SECRETARY

WATCHTV, INCORPORATED • NORTHWEST TELEMUNDO

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554

In the Matter of)
)
Advanced Television System)
and Their Impact Upon the)
Existing Television Broadcast)
Service)
)
Amendment of Parts 73 and 74)
of the Commission's Rules to)
Create a "Class A" Television)
Service)

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To: The Commission

COMMENTS IN SUPPORT OF PETITION FOR RULEMAKING

1. WatchTV, Inc., the licensee of a network of low power television stations in Washington and Oregon,¹ hereby files these comments in response to the Petition for Rule Making filed by the Community Broadcasters Association ("CBA") on September 30, 1997, and amended on March 18, 1998.² WatchTV fully supports the CBA

¹WatchTV holds authorizations for the following LPTV stations: K49EI, Channel 49, Ellensburg, Washington; K52FQ, Channel 52, 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; K55HS, Channel 55, Salem, 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; K39EF, Channel 39, Ashland, Oregon; K39DP, Channel 39, Klamath Falls, Oregon; and K28FP, Channel 28, Astoria, Oregon.

²The filing date for statements in support of CBA's petition is May 22, 1998. See Public Notice No. 82996, released April 21, 1998.



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proposal to adopt rules to create a new "Class A" television station class.

2. Background. WatchTV is the only full-time provider of broadcast Spanish language programming in Oregon and Washington. Families that cannot afford, or choose not to subscribe to, cable television, or live in areas not served by, cable television, can turn only to WatchTV for full-time Spanish language programming, as well as local news and information. WatchTV appeals to a largely forgotten segment of the Oregon and Washington television markets, the primarily Spanish speaking migrant farm workers who are so vital to the economies of the states, as well as to local families where Spanish is the primary language.

3. But others enjoy WatchTV's programming as well. For example, non-spanish speaking callers have told WatchTV staff that the programming provides a window on another culture. Schools have used WatchTV programming as a teaching aid for students learning Spanish as a second language. WatchTV is truly filling a real need in the Oregon and Washington television markets.

4. Discussion. CBA's proposal to adopt a Class A television station class, thereby offering certain LPTV station operators primary spectrum user status, would serve the public interest in a number of ways. First, viewers who have come to rely on WatchTV's programming would not be at risk of losing that programming as the result of the initiation of new services. Viewers do not choose to view a station merely because it is a

full power or and LPTV station; rather, they watch a station because they like the programming. The loss of programming from a LPTV station is as disruptive to a viewer's life as the loss of a full power station, particularly in the case of WatchTV's unique local programming.

5. Second, CBA's proposal allows power increases for LPTV stations meeting Class A criteria, thereby allowing service to more homes with better signal penetration. Currently, for example, many of WatchTV's viewers must use external antennas; operation at higher power would largely eliminate the necessity of external antennas.

6. Third, LPTV station operators have made tremendous investments in their facilities which can be lost at short notice. WatchTV has spent literally millions of dollars to build its network. Adoption of the Class A proposal would protect that investment and encourage licensees such as WatchTV and others who direct programming to minority groups and others not served by mainstream full power stations to continue to upgrade their facilities and to offer new, innovative programming. Furthermore, the primary status of Class A stations would allow LPTV licensees with improved access to capital for future investments.

7. As a final matter, WatchTV supports CBA's proposal to provide Class A status to stations broadcasting not less than 3 hours in each calendar week of programming produced with the market area served by the station, or produced within a market

area served by a group of stations that carry common local or specialized programming not otherwise available to their communities.³ This rule provision would allow and encourage the development of LPTV networks with local programming aimed at specific markets. Absent this provision, the costs of developing programming for each separate station in order to ensure Class A status would be prohibitive; as a result, some LPTV stations would be forced to go off the air.

8. Conclusion. For the reasons stated above, WatchTV supports the CBA proposal to establish a Class A television station class. I declare that the above statements are true and correct to the best of my knowledge and belief.

Respectfully submitted,



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Filed: May 22, 1998

³See CBA's proposal Rule 73.627 (b) (ii).