

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Amendment of Parts 73 and 74 of the)	
Commission’s Rules to Establish Rules for Digital)	MB Docket No. 03-185
Low Power Television and Television Translator)	
Stations)	
)	
Expanding the Economic and Innovation)	GN Docket No. 12-268
Opportunities of Spectrum through Incentive))	
Auctions)	
)	
Amendment of Part 15 of the Commission’s Rules)	ET Docket No. 14-175
to Eliminate the Analog Tuner Requirement)	

Filed Electronically through ECFS

To: The Commission

COMMENTS OF WATCHTV, INC.

1. These Comments are filed on behalf of WatchTV, Inc. (“WatchTV”) in response to the *Third Notice of Proposed Rulemaking* (“NPRM”) in the above-captioned proceeding, 29 FCC Rcd. 12536 (2014).¹ WatchTV is the licensee of seven Class A television stations and seven low power television (“LPTV”) stations and holds construction permits for four unconstructed new low power TV stations. WatchTV has long been a strong advocate of introducing new technologies and advancing more efficient use of television broadcast spectrum.

2. WatchTV has cooperated for several years with Spectrum Evolution, Inc. (“SEI”) in experimenting with new television technologies, including under an experimental license in

¹ The NPRM was published at 79 FR 70824 (Nov. 28, 2014). The Media Bureau extended the deadline for initial comments in an Order, DA-1727, released Dec. 1, 2014.

Portland, Oregon. SEI has filed comments in this proceeding urging the Commission to give LPTV stations the tools they need survive the impending spectrum re-pack by implementing the same technology-neutral policy for TV broadcasting as it has for nearly every other spectrum allocation in the 21st century.

3. WatchTV heartily endorses SEI's comments. It urges the Commission to give those comments careful attention and to adopt SEI's recommendations to the greatest extent possible. To allow fulfillment of the purposes for which LPTV was created over three decades ago, relief must be given and must be *effective* in the real-life environment that LPTV stations face going into the spectrum re-pack process as a secondary service.

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Respectfully submitted,



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