

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Parts 73 and 74 of the)	MB Docket No. 03-185
Commission's Rules to Establish Rules for)	
Digital 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)	ET Docket No. 14-175
Rules to Eliminate the Analog Tuner)	
Requirement)	

COMMENTS

To: The Commission

The Pacific Mountain Network (PMN) is a group of 31 PBS member stations serving the region of our nation from Colorado to California and its borders with Mexico and Canada. Millions of citizens are served in a wide and diverse spectrum of communities, from large metropolitan areas to medium and small rural communities, and Native American reservations. In many cases, the area's PBS member station is the only remaining locally-owned, locally responsive television service.

These stations, along with their commercial counterparts, are able to serve this large region through the use of low-power translators, which boost the station's transmission signals. Without these translators, service to many communities would cease to exist. Without this over the air television service, communities would be cut off from news, emergency broadcasts, cultural and arts programming and severe weather alerts.

For example:

Idaho Public Television relies on 43 translators to provide public television services to viewers across the state of Idaho;

KNPB in Reno, Nevada uses 28 translators to reach 423,000 of its 845,000 viewers, including 27 tribal communities with about 32,400 residents;

KTOO in Juneau, Alaska serves 235 communities which have no other over-the-air television service without translators;

Approximately 50 percent of New Mexico public television viewers are reached by 31 translators. The Navajo Nation in New Mexico would be disproportionately affected by loss of translator service;

Viewers who receive these PMN member stations' signals for free over-the-air would not be the only ones left in the dark if translator service is lost. Viewers who subscribe to cable, satellite, and other pay-television programming services also would lose access to these signals because many of these stations use translators to deliver a good quality signal to MVPDs' receive facilities, consistent with the Commission's must-carry rules. The fact that translators are secondary services without interference protection would be of little consolation to any viewers who lose service if translators are forced off air due to increased interference or a complete loss of spectrum access. As the Commission learned in the digital television transition, the transition "definitely would have been better if the Commission had been able to address this issue more comprehensively earlier in the process."

The PMN member stations are concerned by the silence in the FCC's proposed rule-making regarding spectrum space for translators in the upcoming spectrum repacking. While the stations have been assured by FCC staff that "we'll look into it," there has been no concrete provision made for translator spectrum space. To reiterate, unless spectrum space is allocated for translators, over the air television service to millions of American citizens will be lost. Attempting to "retro-fit" or restore this service after the repacking has happened will not be practical.

The undersigned members of the Pacific Mountain Network urge the FCC to make certain that spectrum space for translators is provided for in the proposed spectrum repacking.

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Respectfully submitted,

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