

Proceeding # 12-268

Dear FCC,

I am commenting on the upcoming TV auction, repack & LPTV in particular.

My wife & I operate a classic LPTV facility (WYBN-LD) focused on the Catskill mountain region of the greater Albany & Upper Hudson Valley of NY.

While many comments are focused on technical, legal & other areas, there are few comments focused on the extended economic harm the repack & auction will create. Smaller affiliates & LPTV?s make their living very close to the economic floor of the US economy.

Our LPTV carries a solid book of ad clients such as pizza parlors, lumber yards, tourism, non profits, car dealers (new & used), banks etc. These businesses yearly revenue range from \$ 250,000 up to \$ 15,000,000.

LPTV facilities across the USA are selling into this same arena as ours at WYBN. These businesses do not need the ultra large coverage of full power stations. They use LPTV for its ability to be affordable & pinpoint the areas reached. The FCC & Congress has to consider the deep & imbued results to our national economy of the MULTIPLIER effect .

The more voices of TV out there for a business to use for sales, promotion and image, then the faster & deeper the turnover of dollars & growth of the GDP. More voices mean higher supply & lower prices. A win win for our retail & service centered economy.

If the auction was in only ONE region of the US, we would heal & move on. However this auction is across the entire US & the results of lowering the multiplier effect will be deep & long lasting. Why would we shoot ourselves in the foot after the recovery from 2007 is just starting to gain momentum?

At the best the repack should end at Ch 41 not 31.

The telcos should be required to build new coverage at a two for one ratio. For every pop in a urban area, a dark or underserved area gets 2 new pops. This should be an unwaverable rule. People are under the assumption more spectrum will fix the bad coverage, it won?t. Only more towers & build outs.

Again the economic impact of the repack and loss of service areas will not help the economic engine of the US but only slow it down.

Respectfully Submitted,
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