

I am Rod Payne, president of CFNT, a station owner/operator in Wichita Falls, Texas.

I want to get my reaction to the proposed Incentive Auction on the record with the Federal Communications Commission Members, members of Congress who will read these comments and others who will avail themselves of them.

Our first low power television station was built years ago in North Texas to serve those here who really weren't, and aren't, being served by the full power stations in this area. Yes, those stations do air newscasts and some public service but their expenses as full power stations dictate much of their resources be used to generate revenue.

We built our station(s) to provide air-time to local non-profit organizations that need to get the word out about the way(s) they enhance our community. We built our station(s) to provide family friendly programming and to air quality children's shows that would educate and inform our younger viewers. We built our station(s) to provide a voice for segments of our populace that cannot afford to buy airtime on the larger stations.

And we have succeeded.

Three times in the last twelve years the National Religious Broadcasters have recognized our efforts with their LPTV Station of the Year award. This award is based in large part on a station's involvement in their community of license. Documentation we submitted for consideration for these awards included letters of thanks from such organizations as our Local Camp Fire, YMCA and Faith Mission.

We are providing an over-the-air platform for various segments of our community. Until our host for the program moved out of town our little station was producing the only locally originated Spanish language television program in this area of North Texas. We still produce the only locally originated programming which is produced by, and for, our African American community. Another of our station produced programs has featured such organizations as Big Brothers - Big Sisters, Hospice of Wichita Falls, Whispers of Hope and Veteran's Affairs.

Six days a week we air Educational and Informational programming for children and youth in our viewing area. With most of the major networks reducing, and redirecting to selective airtimes, their efforts in this area I believe we stand out for our on-going efforts to provide quality programming for the next generation.

It is very important to us to also be able to use our license to broadcast to provide the emergency information people around here might need, especially those who do not have access to cable television, etc. We have our EAS equipment setup to relay weather information, an important item in an area that is known for tornadoes.

We also provide religious programming which enhances the lives of our viewers by providing them with encouragement throughout their week. We broadcast both nationally and locally produced religious programs. These programs include a weekly Bible study produced in our studio as well as programs from well-respected ministries.

I believe we represent what the LPTV station model was designed to be as provided for in the FCC's own rules and regulations. We serve our community. We take our responsibility seriously.

I find several things about the auctioning off of our nation's air-waves in the process of the proposed Incentive Auction difficult to understand.

Why would anyone believe that a cellular phone company without ties to a local community, and without any form of government leading to do so would serve that same community as well as an LPTV station?

Why won't the FCC acknowledge that LPTV is only secondary to Full Power stations?

60001025372.txt

LPTV has never been designated in any legal form as secondary to any other service, including cellular/wireless companies.

Why won't the FCC allow LPTV stations to fully explore the already proven technologies that would provide greater benefit to our communities?

Instead of auctioning off the airwave access of local, community minded stations, or "repacking" them out of existence I would hope that, in America, our government would want to protect these same stations.

The auction as is now proposed is deeply troubling. Without complete studies regarding the potential loss of service for many Americans of free over-the-air broadcast stations this auction is flawed. The provision for wider swatches of phone service cannot possibly outweigh the loss of potentially lifesaving information television stations, and the translators that relay their signals for many rural communities, provide.

I respectfully submit these comments with the hope that it is still not too late to stop what could be a great mistake without more careful consideration and study.

Rod Payne