

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 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 Rules)	ET Docket No. 14-175
to Eliminate the Analog Tuner Requirement)	

To: The Commission

Reply Comments of
Lotus Communications Corp.

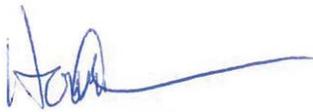
Lotus Communications Corp. ("**Lotus**"), sole shareholder of the licensees of digital LPTV stations KHLM-LD, Channel 43, Houston, Texas, Facility ID No. 57189 (KHLM"), and KPHE-LD, Channel 16, Phoenix, Arizona, Facility ID No. 186602("KPHE"), submitted comments dated January 10, 2015, in the above captioned *Third Notice of Proposed Rulemaking*, released October 10, 2014 (the "**Notice**"),¹ regarding low power television stations ("**LPTV stations**") and TV translator stations ("**TV translator stations**"), and respectfully submits these additional comments.

We have reviewed the comments submitted January 12, 2015 ("USTV Comments"), by U.S. Television, LLC (USTV), the prior owner of KPHE and KHLM, in response to the Notice. As discussed in detail in the USTV Comments, KPHE and KHLM are both among the stations selected to participate in the LPTV digital data service pilot project, and, for the reasons set forth in the

¹ Low Power Television Digital Rules, 79 Fed. Reg. 70,824 (proposed Oct. 9, 2014) (to be codified at 47 C.F.R. pts. 15, 74) (*Third NPRM*).

USTV Comments are entitled to the protection granted in the DDSA to Pilot Participants.² We continue to believe that, for the reasons set forth in our original comments, KHLM and KPHE should be permitted to convert to Class A Status, but we concur with USTV that Pilot participants should be granted the statutory protection of priority for displacement channels in the post-auction repack.

Respectfully submitted,
Lotus Communications Corp.



Howard A. Kalmenson
President
February 2,, 2015

² LPTV Pilot Project Digital Data Services Act (DDSA), Pub L. No. 106-554, 114 Stat. 4577 (Dec. 21, 2000), Consolidated Appropriations – FY 2001, Section 143, amending Section 336 of the Communications Act of 1934, as amended, 47 U.S.C. § 336, to add new subsection (h).