

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 RANDALL A. WEISS

I, Randall A. Weiss, am President and Founder of CrossTalk International, am Chairman of the National Religious Broadcasters ("NRB") television Committee, and own EICB TV, a Christian religious broadcast and production company. EICB TV is a Christian ministry that produces original religious programming that airs on numerous LPTV stations around the country. I have reviewed the comments filed by the Advanced Television Broadcasting Alliance ("ATBA") and the National Association of Broadcasters ("NAB") and wholeheartedly support the positions of both parties regarding owners, operators and licensees of LPTV, translator and booster stations.

We operate dozens of LPTV stations across the nation and have authorizations to construct many additional low power facilities to serve the public. In addition to providing religious programming on all of our stations, our programming schedules offer daily and weekly TV programs that would not otherwise be available to viewers for free in most of our markets. We also provide foreign language programming on many of our multicast program streams.

We strongly oppose any efforts to repurpose spectrum from licensed LPTV and translator stations for unlicensed use through mandatory channel sharing, and join ATBA and NAB in this regard. We also join the NAB in rejecting the proposals by the Open Technology Institute at New American Foundation and Public Knowledge proposing to force licensed LPTV and TV translator stations into mandatory channel sharing arrangements solely for the purpose of opening new white space opportunities for unlicensed operations. We also oppose the proposals of New America, Public Knowledge and the Wireless Internet Service Providers Association that the FCC keep television channels open in each market for unlicensed wireless service.

No matter how this is done, it would result in LPTV and translator stations suffering reduced coverage, higher cost to move or transition, or loss of service altogether. We are operating and providing service today, and people rely on the service we provide. Other bands are available today for unlicensed service, and they are widely used for unlicensed service and the FCC is considering making other bands available for unlicensed use. We appreciate the value of unlicensed spectrum, but allowing the very possibility of future unlicensed devices to displace or constrain services that are licensed and operating today is wrong as a matter of policy, against the public interest, and would create bad precedent going forward, as licensees

