

Please see attachment in PDF format; is attached to the filing.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

In the Matter of)
)
Petition by REC Networks;)
Improvements to the Low Power) RM 11749
FM (LPFM) Radio Service)
)

To: The Commission:

NATIONAL TRANSLATOR ASSOCIATION COMMENTS
IN REGARD TO PETITION FOR PROPOSED RULEMAKING

The National Translator Association (NTA) offers the following comments in regard to RM 11749, Report No. 3022, released May 15, 2015. The NTA is a long-established organization of translator operators and licensees; it has a vested interest in the protection of these services. The translator service, both TV and FM, has for up to a half-century created and maintained stations and systems which have provided to audiences in large areas of rural America programming which they otherwise could not receive.

1. The National Translator Association stands firmly in support of the within entitled petition as filed by REC Networks. The petition raises a significant number of valid points that should be developed in the context of a Rulemaking proceeding and its public record.

2. The NTA anticipates participating actively in the proposed proceeding.

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3. The NTA urges that if within the context of such a proceeding, a filing window is anticipated that considers the need for new LPFM facilities, such a window should also be considered for FM translators. An open filing window for new FM translators is long overdue and would offer rural and otherwise disadvantaged audiences the opportunity of improved FM radio service.

The NTA is now, as it has been for many years, a firm advocate for the translator broadcasting services which it represents, to the extent of being a committed and aggressive advocate for the audiences of these services. The American people own these airwaves as a natural resource, and translator operators, as licensed stewards of the use of some of them, have tried always to act in service to the citizens whose ownership we honor daily by responsible dissemination of programming, information and emergency messages.

Respectfully Submitted,

THE NATIONAL TRANSLATOR ASSOCIATION

J. R. McDonald, its President

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Proof of Service

This document has been served via certified mail, return receipt requested, upon the proponent of the within petition:

REC Networks
Michelle Bradley
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With printed and electronic copies to:
Secretary, Federal Communications Commission
445 12th Street South West
Washington, DC 20554

and electronic copies to:

Board of Directors, National Translator Assn.
Peter H. Doyle, Chief, Audio Division, FCC

I certify that I have transmitted the copies as described herein in the manner described in accordance with FCC Rules.

J. R. McDonald

May 15, 2015