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

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Carriage of the Transmissions)
of Digital Television)
Broadcast Stations)
)
Amendments to Part 76 of)
the Commission's Rules)

CS Docket No. 98-120



To: The Commission

REPLY COMMENTS OF
AMERICAN CHESTNUT TELEVISION, INC.

1. American Chestnut Television, Inc. is the licensee of local full service television broadcast station WGRB in Campbellsville, Kentucky. This station is subject to the provisions of the Communications Act and the Commission's regulations for conversion from analog to digital broadcasting.

2. American Chestnut Television, Inc. opposes the comments filed by the National Cable Television Association. It supports the comments filed by the National Association of Broadcasters and individual television broadcast operators including Harry J. Pappas, H. Dean Hinson (Morris Network), Dean Valentine (UPN), Paxson Communications Corporation and the Trinity Broadcasting Network, among others.

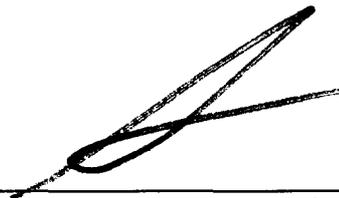
3. In adopting the digital broadcast laws, Congress intended that the system of local television broadcasting which has been in existence since the beginnings of television itself be converted to the new technology; not that it be replaced by non-local, non-broadcast cable programming services. As a practical matter, if both analog and digital broadcast signals

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are not carried by cable during the transition period, the ability of individual television stations to pay the cost of conversion and remain on the air would be jeopardized.

4. While failure to require carriage of analog and digital television broadcast signals during the transition period would threaten the survival of local television broadcast stations, there is no corresponding harm from requiring such carriage, in light of cable's ability to provide vastly expanded channel capacity from channel-splitting and other new technologies.

Respectfully submitted,



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