



NATIONAL TRANSLATOR ASSOCIATION

OUR AIM - TO PROVIDE FM and TV SIGNALS in EVERY HOME

April 29, 2002

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Marlene H. Dortch
Secretary
Federal communications Commission
Washington, DC 20554

Re: Notice of Oral Ex Parte Presentation, ET Docket 01-75, RM-9418, and RM-9856

Dear Ms. Dortch:

This letter is to disclose, pursuant to §1.1206(b) of the Commission's Rules, that an *ex parte* meeting was held on March 21, 2002 concerning the above Proposed Rulemaking, which has permit-but-disclose status.

The oral presentation of the National Translator Association was made by Byron W. St.Clair, President.

The FCC personnel present were:

Rodney Small - OET
Ira Keltz - OET
Tom Derenge - OET
Edmund Ryder - OET
Keith Larson - MB

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Byron St. Clair reported that National Translator Association Board members Kent Parsons and Paul Burkholder had successfully transported three standard 8VSB digital modulation signals on one microwave channel and through one set of microwave equipment. The use of this technique will allow the transmission of three and possibly four channels to translators for use as inputs. This is important not only because it is an efficient use of the spectrum but also because the modulation format of the primary station is preserved. With the signals so preserved the cost and complexity of the translator equipment is reduced. Byron St. Clair specifically asked that the new rules allow the transportation of the signals of multiple primary stations within one microwave channel, subject only to meeting the emission mask.

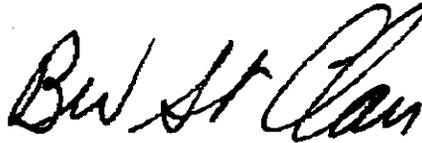
The use of relays on UHF channels on channels 52 to 69 was also discussed. Byron St. Clair pointed out that relays on UHF channels as authorized in §74.602(h) are an

important means of economically transporting signals of primary stations to translator locations where they are used as the inputs to conventional TV translators. It is anticipated that most TV translators will have companion digital translators during the transition period. This is going to cause even more frequency congestion during this time. The National Translator Association feels that it is crucial that translator relays continue to have the spectrum corresponding to channels 52-69 available on a secondary non-interference basis. The Media Bureau accepts applications for translators to operate on these channels on a secondary non-interference basis. It is urgently requested that new relay operations on channels 52-69 be permitted until such time as the Media Bureau determines that no new translator applications will be accepted in this channel range. Given the massive shuffling of existing translator frequencies made necessary by displacements and the need for companion digital translators during the transition, the importance of having the flexibility to operate relays on these channels cannot be over-emphasized. In this connection it should be noted that most translator relays are in relatively remote areas where the new users of this spectrum will, more often than not, be slow to utilize these frequencies.

The National Translator Association thanks the FCC staff members who attended the meeting for the opportunity to make the *ex parte* presentation of the information concerning the multiple 8VSB signals in one microwave channel and to present arguments concerning the urgency of continuing to establish new relays in the spectrum range of channels 52-69.

Very truly yours,

NATIONAL TRANSLATOR ASSOCIATION



By: Byron W. St. Clair
President