

BONNEVILLE  
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CORPORATION

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May 16, 2003

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: *National Translator Association's Petition For Rulemaking To Establish  
A Rural Translator Service, RM-10666  
Comments of Bonneville International Corporation*

Dear Ms. Dortch

Bonneville International Corporation ("BIC"), pursuant to Section 1.405 of the Commission's rules, submits these comments in support of the above-referenced November 6, 2002, Petition for Rulemaking ("Petition") submitted by the National Translator Association ("NTA"). NTA requests that the Commission initiate a rulemaking to amend Part 74 of its rules to establish a new Rural Translator Service. BIC has an interest in NTA's proposal based on its experience with TV translator issues, as the operator both of full service television station KSL-TV in Salt Lake City, Utah, and of several TV translator stations.<sup>1</sup>

BIC's KSL-TV is a significant part of the extensive Utah translator network described in NTA's *Petition*.<sup>2</sup> The TV translator network in Utah has provided an important public service by bringing free over-the-air television service to many otherwise underserved populations in rural areas in Utah. The ability to provide additional television service to rural areas, however, is currently hindered by the Commission's existing procedures for authorizing rural TV translator stations. Simply stated, these procedures do not result in the grant, construction and operation of sufficient TV translator stations to serve the needs of rural areas. Instead of processing

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<sup>1</sup> BIC also is the operator of twenty radio stations in the Chicago, Salt Lake City, San Francisco, St. Louis and Washington, D.C. markets. All of the stations operated by BIC are licensed to a BIC-affiliated company, Bonneville Holding Company.

<sup>2</sup> *Petition* at 10-11 and Appendix B.

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applications in relative order of the need to serve populations without adequate over-the-air signals, the Commission has established infrequent filing windows that combine application windows for translators in both urban and rural areas and for urban and rural low power television stations. This policy not only has resulted in years of delay in the opportunity to file applications for new translator stations, but encourages the filing of speculative applications because of the uncertainty of when the next filing window will be opened. The attendant delays in processing a voluminous number of applications filed simultaneously result in rural areas being left without adequate service for far too many years.

BIC supports and endorses NTA's proposal to create a new Rural Translator Service and to establish rules that will expedite the Commission's processing of applications for traditional translator stations proposing service to rural areas. In particular, BIC supports the establishment of one-day rolling window or day-by-day cutoff procedures for applications that propose service limited to rural areas. The creation of such a Rural Translator Service with expedited processing procedures has the potential to significantly widen the reach of the analog television service to the benefit of currently underserved rural populations.

Moreover, the establishment of a Rural Translator Service could be critical to the development and spread of digital television ("DTV") to rural areas. Obviously, rural populations should not be denied access to free over-the-air DTV services that are being provided to urban areas. Unless, however, rule changes are adopted to promote digital transmission over translators and to establish procedures to expedite the grant and construction of DTV translator stations serving rural areas, the promise and benefits of DTV may not be enjoyed by rural populations until many years after urban populations are served, if at all. The goal of including Rural America in the transition to digital television will be significantly advanced through the adoption of a Rural Translator Service and the implementation of expedited processing procedures.

For these and other policy reasons mentioned in the *Petition*, BIC urges the Commission to initiate the requested Rulemaking to establish a Rural Translator Service with expedited application procedures.

Sincerely,

A handwritten signature in black ink that reads "Greg James" followed by a circled "De" or similar initials.

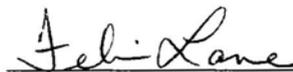
Greg James  
Vice President and Chief Technology Officer  
Bonneville International Corporation and  
KSL-TV

**CERTIFICATE OF SERVICE**

I, Felicia Lane, a legal secretary at Wilkinson Barker Knauer, LLP certify that on May 16, 2003, the attached was served by hand delivery, upon the parties listed below:

Bradley E. Lerner  
Video Division, Media Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
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Qualex International  
Portals II  
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Felicia Lane