

**KMZ Rosenman**  
KATTEN MUCHIN ZAVIS ROSENMAN

1025 Thomas Jefferson Street, N.W.  
East Lobby, Suite 700  
Washington, DC 20007-5201  
202.625.3500 office 202.298.7570 fax

May 16, 2003

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MAY 16 2003

HOWARD J. BRAUN  
howard.braun@kmzr.com  
202.625.3684

Federal Communications Commission  
Office of Secretary

**VIA HAND DELIVERY**

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

Re: DA03-622  
RM-10666  
Comments of TV-61, Inc.

Dear Ms. Dortch:

On behalf of our client, **TV-61, INC.**, there is enclosed herewith for filing in the above referenced proceeding an original and four copies of its Comments In Support of NTA's Proposal to Establish A Rural Translator Service.

Should there be any questions concerning this matter, please contact the undersigned.

Very truly yours,

  
Howard J. Braun

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Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC

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Federal Communications Commission  
Office of Secretary

In re Inquiry to )  
)  
**ESTABLISH A NATIONAL RURAL** )  
**TRANSLATOR SERVICE** )  
)  
)  
To: MEDIA BUREAU )

DA 03-622

RM-10666

**COMMENTS IN SUPPORT OF NTA'S PROPOSAL**  
**TO ESTABLISH A RURAL TRANSLATOR SERVICE**

**TV-61 SAN DIEGO, INC.** ("TV-61"), by its attorneys, hereby files its Comments in response to the Commission's Notice of March 6, 2003 herein requesting comments on the National Translator Association's ("NTA") request to establish a new rural TV translator service. In support thereof, the following is shown:

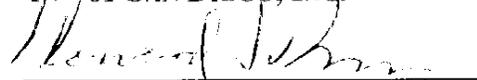
1. **TV-61** is currently the licensee of K61GH, National City, California and has been awarded a construction permit to operate a new LPTV station on Channel 9 in San Diego, California. As a minority owned TV translator station, K61GH provides the diverse communities of San Diego County with a variety of multicultural commercial and educational programming of interest to the Hispanic and Asian residents of its service area. Importantly, as a TV translator licensee, **TV-61** is vitally concerned that TV translators in America continue to flourish in a conducive regulatory environment and that such stations, especially in underserved rural areas, continue to provide free over the air programming to such areas. It is for this reason that **TV-61** fully supports NTA's rulemaking proposal.

2. More specifically, on March 6, 2003, the FCC issued a Notice herein inquiring whether the agency should proceed with a full scale rule making proceeding to establish a

national rural translator service as proposed by the NTA. NTA properly believes that inauguration of such a new service will help ensure the delivery of free broadcast services to rural America, especially during the digital conversion. TV-61 believes that NTA has presented cogent and compelling reasons for the Commission to institute rulemaking proposing simplified procedures to establish a new rural TV translator service to serve America's hinterlands and rural areas outside markets such as San Diego, California.

3. Accordingly, TV-61 urges the FCC to solicit formal comments from all interested parties on NTA's request. In short, given the Commission's avowed goal of establishing a DTV broadcast service with the attendant benefits of HDTV, a free over the air commercial and non-commercial broadcast service can only be guaranteed in rural areas by TV translators in the manner proposed by NTA. Given these circumstances, NTA's rulemaking proposal ought to be adopted by the Commission.

Respectfully submitted,  
**TV-61 SAN DIEGO, INC.**



By: Howard J. Braun, Esq.  
Its Attorneys

**KATTEN MUCHIN ZAVIS ROSENMAN**  
1025 Thomas Jefferson Street, N.W.  
East Lobby, Suite 700  
Washington, DC 20007-5201  
Tel: 202-625-3684; Fax: 202-298-7570  
e-mail: howard.braun@kmzr.com

May 16, 2003

**CERTIFICATE OF SERVICE**

I, Karen Kelly, a secretary at Katten Muchin Zavis Rosenman, hereby certify that on this 16<sup>th</sup> day of May 2003, a copy of the foregoing **COMMENTS IN SUPPORT OF NTA'S PROPOSAL TO ESTABLISH A RURAL TRANSLATOR SERVICE** was sent via first class US Mail, to the following:

Keith Larsen, Chief Engineer  
Media Bureau  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Room 2C-420  
Washington, D.C. 20554

Hossein Hashemzadeh, Assoc. Division Chief  
Video Division  
Media Bureau  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Room 2C-866  
Washington, D.C. 20554

Bradley Lerner  
Video Division  
Media Bureau  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Qualex International  
Portals II  
445 12th Street, S.W.  
CY-B402  
Washington, D.C. 20554

  
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Karen R. Kelly