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RECEIVED

May 23, 2003

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VIA HAND DELIVERY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Federal Communications Commission
Office of Secretary

Re: RM-10666
Notification of meeting

Dear Ms. Dortch:

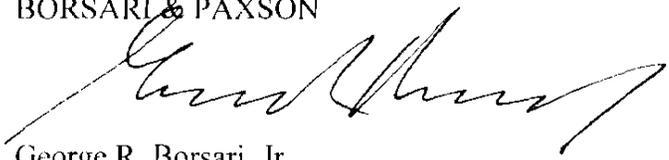
On May 16, 2003, Byron St. Clair, president of the National Translator Association, and I met with Commissioner Kevin Martin and his legal advisor, Catherine Bohigian. We discussed with Commissioner Martin various proposals of the National Translator Association to assist in the digital transition and to ensure the availability of free over-the-air television in rural areas. One of the matters discussed in that meeting was the pending Petition for Rulemaking to establish a Rural Translator Service. That proceeding was designated as Permit but Disclose under Section 1.1206 of the Commission's Rules.

Pursuant to Section 1.1206(b)(1) of the Commission's Rules, the attached document labeled Concerns of the National Translator Association was provided at the meeting. Neither the written presentation nor the oral presentation went beyond the written submission of the National Translator Association in its Petition for Rulemaking.

This letter is being filed in duplicate with the Secretary of the Commission and, in addition, in accordance with the instructions contained in the Commission's Public Notice of March 6, 2003 (DA03-622), copies are being furnished to Bradley E. Lerner of the Video Division, Media Bureau, and a copy is being served on Qualex International.

Very truly yours,

BORSARI & PAXSON



George R. Borsari, Jr.

No. of Copies rec'd 0+2
Date 5/23/03

CONCERNS OF THE NATIONAL TRANSLATOR ASSOCIATION

RURAL TRANSLATOR SERVICE

Until 1979 TV translator applications could be filed at will and were processed in a reasonable time. With the advent of LPTV (using the same Rules and spectrum as translators), the filing of applications has become difficult and the processing time has become unacceptably slow.

NTA has proposed the establishment of a "Rural Translator Service" with a simplified application procedure and expedited processing (RM – 10666).

The requirement that conflicting applications be resolved by auction even for secondary services such as translators has led to the following procedures:

- 1) no up-front filing fee is required
- 2) there is no limit on the number of applications from one applicant

These procedures (or the lack thereof) have had the unintended consequence of inviting to a massive onslaught of speculative filings. (Last LPTV/translator filing window -- over 4,000, last FM translator filing window – over 14,000)

DISPLACEMENT DECLARATORY RULING

NTA requested in July of 2002 that the Commission issue a Declaratory Ruling that translators and low-power stations on Channels 52-59 be allowed to operate until the digital transition is complete. Congress said that they did not want disruption of current television service during the transition.

DIGITAL TRANSLATORS

There are no Rules for DTV translators (translators to repeat digital primary stations). They are only now being worked on (prospective NPRM), but so far there is no way to expand digital TV into translator-dependant rural areas.

HDTV STA

A request by Summit County, Utah, supported by NTA, is pending to use displaced channels for HDTV until the new user of the band actually begins use. As an example, a station on Channel 54 displaced to Channel 44 would use Channel 54 solely for HDTV temporarily until the new user of the channel is established. This would establish a short-term general policy.

FM DISPLACEMENT RELIEF

There is no provision in the Rules for providing relief for displaced FM translators. NTA has informally requested the FM Branch to provide some relief (comparable to the displacement provision available to TV translators), but nothing has happened. NTA will soon file a formal petition for a rulemaking to address this problem.