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2355 Ranch Drive * Westminster, CO 80234
303-465-5742 * FAX 303-465-4067
E-mail: stcl@aol.com

B. W. St. Clair

June 16, 2003

TO: Federal Communications Commission

RE: RM-10666
National Translator Association Proposal for a Rural Translator Service
Reply Comments

These "Reply Comments" are prompted by the "Opposition" filed by the IEEE Local and Metropolitan Standards Committee (IEEE 802).

I act as a consultant to many translator groups in the technical aspects of their translator facilities including the filing of FCC applications

To illustrate the failure of this IEEE committee to understand the needs of Rural America I wish to describe the experiences of the small community of Enterprise KS. This community is about 12 miles east of Abilene, KS, half way between Manhattan and Salina. While Kansas is thought of as being entirely flat this community is actually in a river bottom. There is reliable reception from only one TV station and this is a satellite of a more distant station. Reception of other stations is inhibited by a combination of distance and the depressed location of the community.

There is anecdotal evidence that many small independent cable systems serving small communities in relatively rural areas are having difficulty remaining successful businesses, faced as they are with the cost of upgrading to digital capability and with the competition of satellite delivery.

In the case of Enterprise the cable system ceased operation entirely leaving reception from only one TV station and that a satellite of a more distant station. The lack of relatively local TV reception was considered a serious problem by the city government and they made an all out effort to obtain four translators to bring TV stations from the same region.

It was, of course, not possible for the City of Enterprise to file applications for new translator stations at the time their need arose. As the Commission is well aware under the present rules and procedures applications for new translators can be filed only during announced "filing windows" and these occur only once every several years.

There is a happy ending. The Commission recognized that the sudden and unexpected loss of service to the public was an unpredictable and exceptional event and granted "STA's" for four translators. However, both the Commission and the City of Enterprise considered this an undesirable solution. Further it is the Commission's policy, absent truly exceptional circumstances, not to grant "STA's" unrelated to a licensed station (or construction permit) so the use of "STA's" is not a general solution.

The purpose of this story is to illustrate that the elected government of the City of Enterprise felt strongly about the need for relatively local TV service with news, weather and emergency warnings from regional TV stations. They were willing to go through a considerable negotiating process with the FCC to get exceptional "STA's" and to cover the cost of a four translator installation.

It also demonstrates the need for a translator application procedure that is available when needed and which can result in the granting of construction permits without undue delay.

Respectfully submitted

A handwritten signature in cursive script that reads "B. W. St. Clair".

B. W. St. Clair