

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

In the Matter of	)	
	)	
Amendment of Parts 73 and 74 of the	)	
Commission's Rules to Establish Rules for	)	MB-Docket No. 03-185
Digital Low Power Television, Television Translator, and	)	
Television Booster Stations and to Amend Rules	)	
for Digital Class A Television Stations	)	

**STATEMENT IN SUPPORT OF NTA'S COMMENTS**  
**TO ESTABLISH A NEW DIGITAL TV TRANSLATOR SERVICE**

SELECTIVE TV, INC. ("STV"), by its attorneys, hereby files its Statement supporting the Comments of the National Translator Association ("NTA") urging the adoption of new rules to permit digital operation of TV translators. In support thereof, the following is shown:

1. STV is the licensee of 17 UHF TV translators licensed to Alexandria, Minnesota. A list of STV's licenses is appended hereto as Exhibit A. STV is a non-profit corporation organized over 20 years ago to provide free broadcast and other important program services to tens of thousands of homes in the rural west central Minnesota area many of which, but for STV's efforts, would be deprived of free over the air TV service. Currently, STV provides TV translator service to Douglas County, Minnesota and portions of surrounding counties.

2. Tourism and agriculture are the major businesses in STV's service area and it relies on voluntary contributions to sustain its TV translator operations. Importantly, STV is vitally concerned that TV translators in America continue to flourish in a conducive regulatory environment and that such stations, especially in rural areas such as Alexandria, Minnesota, continue to provide free over the air programming to such areas in a digital mode. It is for this reason that STV supports NTA's Comments herein.

3. More specifically, on August 29, 2003 the Commission issued a Notice of Proposed Rule Making (“Notice”) seeking to bring digital TV service to rural America, thus taking an important step to further the progress toward the transition to a nationwide DTV service. In its Notice, the Commission has tentatively concluded that digital TV translator stations should be technically capable of retransmitting the complete signals of DTV broadcast stations for reception by the general public. Importantly, the Commission is mindful of the challenges presented by limited spectrum availability and the limited budgets of many rural TV translators such as those owned by STV.

4. Recognizing the FCC’s valid concerns, NTA has urged the FCC to hasten the authorization of digital capability for TV translators, while not upsetting the current relationship between existing TV translators and LPTV stations. In this connection, NTA believes that the rapid inauguration of a new digital TV translator service will help ensure the continued delivery of free broadcast services to rural America and other underserved areas in this country which are areas served by STV. In other words, there is no justifiable public interest reason to deprive citizens of rural America the benefits of free digital TV reception via TV translators, when the rest of the country in more populous areas are able, and will be able, to obtain such service at the end of the digital TV transition.

5. In sum, we believe that NTA has presented cogent and compelling reasons for prompt adoption of rules and regulations by the FCC to expedite over-the-air digital TV translator

reception in America's hinterlands and rural areas. Accordingly, NTA's Comments ought to be promptly adopted by the FCC.

Respectfully submitted,  
**SELECTIVE TV, INC.**



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**Selective TV, Inc.**

K16CO, Alexandria, MN  
K18DG, Alexandria, MN  
K26CL, Alexandria, MN  
K30AF, Alexandria, MN  
K32EB, Alexandria, MN  
K34AF, Alexandria, MN  
K36AA, Alexandria, MN  
K38AC, Alexandria, MN  
K48DV, Alexandria, MN  
K50DB, Alexandria, MN  
K52DZ, Alexandria, MN  
K55ID, Alexandria, MN  
K58DS, Alexandria, MN  
K60EJ, Alexandria, MN  
K62AU, Alexandria, MN  
K65HD, Alexandria, MN  
K67HI, Alexandria, MN