

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the matter of:

Amendments of Parts 73 and 74 of the  
Commissions Rules to Establish for  
Digital Low Power Television, Television  
Translator, and Television Booster Stations  
and to Amend Rules For Digital Class A  
Television Stations

MB Docket No. 03-185

**COMMENTS OF WORD OF LIFE MINISTRIES - KADO CA**  
SHREVEPORT, LOUISIANA  
Facility ID: 38497

We would like to limit our comments to the use of the LPTV service to hasten the DTV transition, both in the broadcast and consumer arena, and limit disruption of existing service to the consumers served by analog LPTV and translator stations. We believe this can be done while serving the Commission's localism goals as well. Therefore, we submit the following comments.

Section 1: Application Prioritization & Filing

Considering the slow movement of the DTV transition, and the reluctance of consumers to get on board with DTV tuners, all LPTV, Class A, or Translator stations that are willing to switch to DTV service within 6-12 months, and are willing to adhere to the same standards as current Class A stations, should be granted unconditional cable carriage of their primary free programming signal until all broadcasters in their market have ceased NTSC broadcast, completely. The cable carriage would come in exchange for their, on channel, switch to DTV and would be a good balance between their audience loss and the furtherance of the DTV transition. Cable carriage would begin within 30 days of the licensee beginning full time DTV broadcasting. This solution would further

the DTV transition, and make efficient use of the digital spectrum. Applications for this service should not be prioritized in processing over displacement applications.

The application process should be as follows:

1<sup>st</sup>.) Displacement applications for any LPTV, Class A, or Translator seeking to move its current analog service to digital. Excluding those operating in channels 52-69 who may not be threatened yet, but are seeking to vacate those channels.

2<sup>nd</sup>.) Displacement applications for any LPTV, Class A, or Translator seeking to move its current analog service to another analog channel, considering that once a market has reached 50% DTV tuner penetration, no further analog licenses of any kind should be granted in that market

3<sup>rd</sup>.) Incumbent LPTV, Class A, or Translators seeking to move their current service to digital. Provided that they broadcast on their same channel and maintain the same coverage area, in digital, that they had in analog.

This includes broadcasters operating in channels 52-69 who may not be threatened yet, but are seeking to vacate those channels.

Any analog LPTV, Class A, or Translator station, that is operating in channels 14 - 51, and is not facing a displacement threat, but wishes to switch to digital operation immediately, provided that they are not able to secure a second channel to broadcast on.

4<sup>th</sup>.) Incumbent LPTV, Class A, or Translators seeking to obtain a second channel to begin DTV transmission.

Criteria on these licenses area as follows:

- That the licensee not apply for use of channel 60-69.
- That the licensee may apply for licenses up to the same number of licenses and CP's that they currently possess.
- That the licensee give back as many licenses as they were granted, after the market of each individual license, has ceased all NTSC broadcasting.
- That these channels be secondary only to full power stations, until the end of NTSC broadcasting in that area. At that point they become protected.
- That the licensee agree to a shortened construction period of 20 months.

5<sup>th</sup>.) New applicants seeking to obtain a new LPTV, Class A, or Translator DTV license, or incumbent licensees seeking to change their coverage area.

### Section 2: Channels 52-69

Channels 52-59 to be open for use by any LPTV, Class A, or Translator operator, provided that there are no other channels available. They should also be granted use in this spectrum on a secondary basis to full power stations, but be protected from alternate uses of the spectrum until 9 months after their market has ceased NTSC broadcast. After that, they become completely secondary to uses of that spectrum, but may remain until they are displaced.

Channels 60-69 to be open to broadcasters for displacement only and operate on a secondary basis to any other uses of that spectrum. Also, that they vacate those channels within 1 year of the end of the DTV transition.

### Section 3: Mutually Exclusive Applications

All LPTV, Class A, or Translator operators are to be given the chance to settle MX applications, either through engineering methods, or any other type of agreement. This would decrease processing time.

### Conclusion:

LPTV, Class A, & Translator stations can play a significant role in furthering the Commissions goals of DTV roll out and localism. LPTV stations bring television service to viewers otherwise under served by existing service providers, as well as provide excellent “niche” programming to viewers. No other television service does “local” like LPTV does it. To force LPTV, Class A, or Translator stations to do an on channel switch guarantees that viewers will be left out, and tremendous financial hardships will result on the broadcaster. Hardship that are most likely to be unrecoverable.

Respectfully,  
Chad Giddens