

**COMMENTS OF RENARD COMMUNICATIONS CORP.**  
**REGARDING FCC 07-217**

Renard Communications Corp. (“Renard”), a licensee of LPTV stations since 1984 wishes to comment specifically on Section G, paragraph 99, of the Commission’s *Notice of Proposed Rulemaking*.

The Commission should adopt cable must-carry legislation for Class A television stations, but this should not be done in a vacuum. That is to say that legislation should be adopted which modifies the Commission’s rules to add Class A allotments to the Table of Allotments in the same manner as the Commission did so for the FM radio service in the 1980s (Docket 80-90).

Previous to that period, the Commission’s rules provided only for Class A, B and C FM stations and further had rules prohibiting the intermixture of Class A stations on the same frequencies as Class B and C stations. This was determined to be an inefficient use of spectrum. A simple example would be: if two co-channel Class B stations were spaced at a distance of 240 miles, a third co-channel Class B station could not be “dropped in” between the stations due to the fact that 150 miles would be required between each station. The third station, in this case, would be only 120 miles from each existing station and would not comply with the minimum distance requirements. The Commission realized this inefficiency of spectrum usage and adopted new rules to allow, for example, a Class A station to be dropped in between. The required distance between a Class A and B station is 111 miles, so having met the minimum distance requirement, a new station could be licensed to provide service. This greatly enhanced efficient use of the spectrum and provided for nearly 700 initial new FM allotments.

The concept is the same for television. Only a single class of full-power station is recognized. Due to propagational differences in the various zones (I, II & III), the required minimum-spacings are slightly different and a slight difference also exists among the three bands (VHF low ch. 2 – 6, VHF high ch. 7 – 13, UHF ch. 14 – 51). However, the efficiency of spectrum usage can be greatly enhanced by allowing Class A stations to fit in as a lower-power allotments. For example, where two full-power co-channel UHF (DTV) stations would require a minimum distance of 122 miles, using the same interference criteria, the minimum distance between a Class A DTV station (15 kW @ 150 m.) and a “regular” full-power DTV station would only need to be approximately 89 miles apart.

The concept of several classes of television stations is not new. For example, Canada has five classes (A, B, C, VU & VL) of full-service UHF television stations and has already proven that this has greatly enhanced use of the available spectrum.

In summary, adoption of the concept of two classes of television stations in the Table of Allotments thereby allowing Class A stations to be considered on an equal plane is a sound modernization of efficient spectrum usage.

Respectfully submitted,

RENARD COMMUNICATIONS CORP.

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