

I am submitting these comments to the FCC in response to comments made by the NAB regarding increasing the number of stations eligible to participate in the "nightlight" program. While I appreciate their goal and largely agree with their comments, I feel that they made an error in one minor point. While the low-VHF band is largely clearing out, and these stations should be used for airing "nightlight" programming, some of the stations deemed eligible in their filing should not be treated as such. In my specific situation, stations WTKR-3 and WBTV-3 should not be permitted to participate in this program. As the FCC knows, low-VHF digital TV stations are crippled by noise and interference due to how well these signals propagate. In my area, WBRA-DT's signal is shaky at best, and one suggestion has been that eliminating co-channel interference from nearby markets would help with these issues. If these two stations are allowed to continue analog broadcasting for a month after the transition, there could be many periods of time when WBRA-DT is unavailable to local viewers, and with no analog signal to fall back on, those viewers would be left without that service.

Presently at my home, which is within the WBRA-DT coverage contour, my "normal" WBRA-DT signal which typically provides 16-17 dB SNR, just barely in the decodable range, is at 13 dB, and thus will not decode. At the same time, I am seeing analog signals from Greensboro, Richmond, and Raleigh with surprising clarity. It is not beyond reason that interference from WBTV-3 and WTKR-3 are contributing to this problem.

In conclusion, I support everything else the NAB proposed with regard to the "nightlight" program. I would just like to ensure that low-VHF digital stations are properly protected from interference once the analog signal is gone forever.