

***Before the  
Federal Communications Commission  
Washington, DC 20554***

In the Matter of )  
)  
Amendment of Parts 73 and 74 of the )  
Commission’s Rules to Establish Rules for ) MB Docket No. 08-253  
Replacement Digital Low Power Television )  
Translator Stations )

Reply Comments of du Treil, Lundin & Rackley, Inc.

The firm of du Treil, Lundin & Rackley, Inc. (dLR) respectfully submits these Reply Comments in the above captioned proceeding relating to the *Amendment of Parts 73 and 74 of the Commission’s Rules to Establish Rules for Replacement Digital Low Power Television Translator Stations*. dLR, and its predecessors, have provided consulting engineering services to the broadcasting industry for over 60 years including assisting broadcasters in preparing thousands of applications for full-service and translator television operations.

Below is a summary of the comments that dLR supports in MB Docket Number 08-253:

- dLR supports permitting Replacement Digital Low Power Television Translator Stations to voluntarily employ a full-power emission mask filter to permit the use of the same adjacent-channel allocation protection criteria as that used by full-service stations.
- dLR supports permitting *de minimis* extension of the Replacement Digital Low Power Television Translator protected contour beyond that of the associated analog Grade B contour to permit additional translator coverage design flexibility of those translators using “off-the-shelf” antennas.

### Voluntarily Full-Service Station Emission Mask

dLR supports the comments of *Renard Communications Corp.*<sup>1</sup> to allow translator stations, if they are in compliance with the full-service station's emission mask, to use the full-service adjacent channel allocation protection criteria. dLR supports this concept for the following reasons:

- A full-service stations' emission mask would permit the translator(s) to employ the same adjacent channel allocation protection criteria, defined in Section 73.623(c)(2) of the Commission's Rules, as that used by full-service stations. These full-service allocation protection criteria will increase the probability of finding a permissible translator station channel. This is because the adjacent-channel protection criteria that current TV translator stations are eligible to employ are more restrictive than the full-service criteria. In areas of great frequency congestion, such as in the Northeast, California and the Carolinas, this additional allocation flexibility would be beneficial in finding possible channels. As Commissioner McDowell already questioned, "How much room, particularly in big-city markets, will there be for such facilities?"<sup>2</sup> If this additional allocation flexibility is provided, then the likelihood of finding possible channels will increase.
- The technical personnel at these full-service stations, which are the only operators of these translator stations, are already competent in the installation, maintenance and certification of a full-service stations' emission mask. Therefore, the full-service station already has personnel with the technical competency to apply the full-service station emission mask to these TV translators.
- By increasing the number of channel possibilities to TV Translators by using the full-service adjacent-channel allocation protection criteria, the likelihood of having to employ "out-of-core" UHF spectrum above channel 51 will be reduced.

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<sup>1</sup> See Comments of Renard Communications Corp.

<sup>2</sup> See Statement of Commissioner Robert M. McDowell in Notice of Proposed Rulemaking in Amendment of Parts 73 and 74 of the Commission's Rules to Establish Rules for Replacement Digital Low Power Television Translator Stations.

Extension of Translator Protected Contour

dLR supports the comments of *Association Of Public Television Stations*<sup>3</sup> to permit *de minimis* extension of the Replacement Digital Low Power Television Translator protected contour beyond that of the associated analog Grade B contour to permit additional coverage design flexibility of those translators. It is expected these translator stations will generally be implemented with off-the-shelf, or standard, directional antennas in order to be quickly constructed. Therefore, these standard directional antennas will inherently limit the flexibility of constraining the translator protected contour with that of the associated analog Grade B contour. dLR respectfully defers to the Commission to define *de minimis* in this application, either perhaps on a case-by-case basis or by a bright-line definition.

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<sup>3</sup> See Comments of the The Association Of Public Television Stations.