

WATCHMEN BROADCASTING

December 9, 2009 Expanding the Network to Reach the World

Via Electronic Comment Filing System

The Hon. Julius Genachowski
Chairman, Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

**Re: NBP Public Notice #26
GN Docket Nos. 09-47, 09-51, 09-137**

Dear Mr. Chairman:

I am president and founder of Watchmen Broadcasting Productions, Inc., which is the licensee of digital Class A station WBPI-CD, Augusta, Georgia (Fac. Id. 17464). We have been operating WBPI as a Christian/ Family Friendly, community-based Class A station for the last nine years. This longstanding channel has given us a huge presence in our local community. This past September, we converted the station to digital to continue to serve the community and to reach out to new viewers.

Our greatest hope is that we can continue to provide these much needed services to our community without having to worry that the spectrum that was allocated to us will be repurposed for broadband or leased to third parties. Because of this, we are greatly concerned regarding the public notice that was issued on December 2, 2009 that, while requesting comment, appears all too eager to repurpose the digital spectrum we have only just now received for broadband.

As you know, the FCC did not begin to allow low power television stations, like Class A, to transition to digital until 2004. Even then, we did not get a flash cut permit for WBPI until August 2006. Once we did get that permit, however, we invested over three years in planning to go digital and one year evaluating the best use of the additional digital spectrum to make money. We have also invested almost \$500,000.00 to transition WBPI to digital and have incurred marketing costs in excess of \$100,000.00 to change our identity. The purpose of all of this investment of time, energy, and finances has been to ensure that we have effective plans in place to make full use of our entire digital spectrum. We simply do not agree that there is a need for our digital spectrum to be "repurposed" because we have every intention of using all of it.

Indeed, we have already begun to make arrangements for this additional spectrum to be used. In March 2010, we plan to launch on one secondary channel a local business channel in which local businesses will be able to sponsor family friendly content and promote their business in the commercial avails. Also, we are currently researching how to offer Mobile TV on another additional channel, again, which we hope to launch in 2010. We also have plans to generate additional revenue streams in 2010 by leasing out

Television That Changes Lives

P.O Box 3618 • Augusta GA 30914-3618
803 278-3618 • www.wbpi.org

other portions of our spectrum to organizations with similar values. As you can see, we have planned extensively for the use and exploitation of all of the spectrum that has been allocated to us.

Not only does this spectrum represent an opportunity for us to expand our reach into the community, which we have not been able to achieve through traditional means through carriage on satellite systems, it also represents a great source of revenue for our station. For low power stations like ours, revenue is hard to come by, particularly in our current economic climate. If we cannot generate enough revenue, then our services to the community would be compromised. The public interest surely would not be served by forcing low power stations that provide priceless programming to traditionally underserved populations to curtail their programming or go off the air entirely all in the name of increasing bandwidth for movie downloads.

In the event the Commission elects to allow for third party leasing of spectrum in lieu of outright taking of the spectrum, we must insist that we be given the choice of which organizations or companies use our spectrum. We have built our station on being a family-friendly alternative to main stream broadcasting, and are very wary of our spectrum being leased to third parties who would not uphold that image. We cannot let that image be compromised in the name of spectrum efficiency.

In conclusion, the station has been licensed to and serving our local community for over fourteen years. We are an outlet for the promotion of local businesses, churches, and community events. Our production and media training have been utilized by local schools, churches, college students, and many others. We have committed hundreds of thousands of dollars to transitioning our station to digital operation and have made extensive plans for the use of the additional spectrum that was allocated to us. We do not agree that digital spectrum should be repurposed for broadband, particularly our low power digital spectrum that has required such an investment in time and money to bring to life only within the last few months. It is simply not in the public interest.

We hope that you take our concerns into consideration.

Sincerely,



Dr. Dorothy Spaulding
Founder, Watchmen Broadcasting Productions, Inc.
Licensee of WBPI-CD

DS/vj