

It is shocking that the Commission is even considering reallocating any part of the television broadcast spectrum.

Fewer than half the nation's television stations have completed the digital transition. The Commission has focused its efforts on the transition of full power stations and has largely neglected low power television stations, which have undergone repeated displacements and are still being displaced. There is a continuing scarcity of channels on which displaced stations may be rebuilt.

Until the transition of all federally-licensed television stations, including low power television stations as well as full power, is completed, it is premature to even consider the reallocation of television spectrum.

It should be noted that our nation's free over-the-air television services have long been the envy of the world. It would be a shameful tragedy and contrary to the public interest for those services to be impaired by the reallocation of any part of the television broadcast spectrum for non-broadcast purposes.

Respectfully submitted,

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