

One Ministries, Inc.  
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RE: MM Docket 03-185

One Ministries, Inc. is a non-profit corporation and a LPTV and educational FM licensee. We would like to request that the Commission allow LPTV stations until 2015 to convert to Analog. On one hand the Commission is threatening to take away 120 MHz of TV spectrum, and on the other hand the Commission is asking LPTV stations to spend thousands of dollars to convert to digital. The LPTV stations have no way to know if their investment to convert to digital will be money flushed down the toilet due to their spectrum being taken away by full power stations being moved to their frequency or to a wireless carrier taking away their channel. This is like the government asking homeowners to remodel their houses right away or it will be taken away and then telling them that their house may anyway be taken away next year to move a mansion across the street to their address. Who in their right mind would spend money for which their investment is at huge risk? Ultimately, if the Commission forces deadlines to quickly convert LPTV stations, they will instead force LPTV stations off the air and cause a loss of service to low income and minority viewers who depend on free local TV. As Americans struggle through recession and belt tightening and as cable TV rates and cellular phone rates skyrocket, they are reverting back to free over the air TV in droves. It would not be in the public interest to limit the vital services that LPTV stations provide by forcing them off the air due to them needing to spend large sums of money quickly to convert their stations.

We would like to further request that the Commission continue to allow flexibility for LPTV stations to file for minor modifications for moves greater than 30 miles. LPTV stations are often owned by minorities and educational organizations that don't have exhaustive financial resources, and it is often necessary to move more than 30 miles to find economically priced tower space and to cover sufficient population to make LPTV stations economically viable or to avoid causing interference to other TV stations. The vast majority of LPTV stations are not granted must carry to be on cable systems, and they are threatened, because of lack of permanent status due to no class A filing windows in the last decade. Limiting the ability of LPTV to perform minor modifications greater than 30 miles could result in the death of LPTV stations.

We would further like to request that the Commission allow LPTV stations to fill the need for wireless spectrum by themselves being unleashed to provide wireless content through using OFDM modulation standards instead of 8-VSB. This will allow spectrum to be used much faster for wireless mobile uses instead of forcibly taking away spectrum and giving it to large corporations that aren't interested in providing local content. This will also create wealth for women and minorities who own LPTV stations and creates wealth for all Americans by freeing them from the tax of cable TV and wireless carriers.

Best Regards,  
Keith Leitch  
Director, One Ministries, Inc.