

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Amendment of Parts 73 and 74 of the)
Commission’s Rules to Establish Rules for Digital) MB Docket No. 03-185
Low Power Television, Television Translator, and)
Television Booster Stations and to Amend Rules)
for Digital Class A Television Stations)
)
)
To: Office of the Secretary
Attn: The Commission

COMMENTS OF CORDILLERA COMMUNICATIONS, INC.

Cordillera Communications, Inc. (“Cordillera”), by its attorneys, submits herewith its comments in response to the Commission’s Notice of Proposed Rule Making¹ that would bring the low power television station digital transition to a completion. Through wholly-owned subsidiaries, Cordillera owns a number of full power and low power television stations² and thus has an important interest in the outcome of this proceeding. Cordillera generally supports the *Notice*’s proposals as prudently facilitating the digital conversion of low power television stations. Cordillera respectfully submits these brief comments to address two specific aspects.

I. THE ANALOG SHUTOFF DATE SHOULD BE OCTOBER 31, 2012.

The *Notice* proposes that “in-core” low power television stations terminate analog service on June 12, 2012, in an effort to balance the regulatory need for a successful but prompt

¹ Amendment of Parts 73 and 74 of the Commission’s Rules to Establish Rules for Digital Low Power Television, *Notice of Proposed Rule Making*, MB Docket No. 03-185, FCC 10-172 (rel. Sept. 17, 2010) (“*Notice*”). In these comments, Class A TV stations, LPTV stations, and TV translators are referred to collectively as “low power television stations,” as did the *Notice*.

² Stations are listed in Appendix A.

transition.³ Cordillera believes that the Commission instead should select a shutoff date of October 31, 2012 so that low power stations may have the benefit of a full construction season, which many licensees almost certainly will need. As the Commission recognizes, numerous low power television stations serve remote and rural areas of the country.⁴ Merely traveling to the many far-flung transmitter sites – much less converting low power television stations to digital – will be time-consuming for licensees. Moreover, plenty of western low power stations – including some owned by Cordillera – transmit from mountaintops that very well may remain inaccessible during the month of June due to unmelted winter snows. Under the *Notice*'s proposed deadline, such low power television stations would have an effective conversion date of October 31, 2011 – which is less than a year away and we only are at the comment stage. Furthermore, many low power television stations are community-owned and likely will lack the resources necessary to complete DTV construction on an abbreviated basis. To give low power television stations the benefit of a full construction season, the Commission should adopt a shutoff date of October 31, 2012.

II. CERTAIN “FLASH-CUT” APPLICATIONS SHOULD BE PROCESSED WITHIN TEN DAYS.

As an owner of many low power television stations, Cordillera recognizes that the Media Bureau typically processes construction permit applications expeditiously. To facilitate an orderly and successful digital transition, Cordillera believes that the public would benefit from formalizing this typically prompt processing until such time as the analog shutoff date has passed. Cordillera proposes that the Media Bureau commit to completing application processing

³ *Notice*, ¶ 10.

⁴ *Id.*, ¶ 9.

within ten business days of submission if the licensee proposes to convert to digital facilities on the station's authorized analog channel – and so long as there is no expansion of proposed service or international coordination requirement. By committing to process flash-cut applications in its typically prompt fashion, the Media Bureau at little cost would provide valuable certainty to the many low power television stations which already will be facing an abundance of uncertainties in the form of equipment orders and delivery, tower crew scheduling and availability, and resource limitations.

* * *

For the reasons stated herein, Cordillera respectfully urges the Commission to refine the *Notice's* proposals as requested.

Respectfully submitted,

CORDILLERA COMMUNICATIONS, INC.

/s/

By: _____
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APPENDIX A

Stations Owned by Cordillera Communications, Inc.

Cordillera Communications, Inc. is the direct corporate parent of the following broadcast station licensees and permittees:

KATC Communications, Inc., licensee of KATC(TV), Lafayette, Louisiana

KPAX Communications, Inc., licensee of KPAX-TV, Missoula, Montana;
K18AJ/K39KV-D, Kalispell, Montana

KXLF Communications, Inc., licensee of KXLF-TV, Butte, Montana; KXLH-LP/KXLH-LD, Helena, Montana; and K26DE, Bozeman, Montana ,

KRTV Communications, Inc., licensee of KRTV(TV), Great Falls, Montana;
K45CS-D, Lewistown, Montana; K48AI/K27JW-D, Joplin, Montana , K11WK-D, Stanford, Montana, and K11WQ-D, West Knees, Montana

KCTZ Communications, Inc., licensee of KBZK(TV), Bozeman, Montana;

KTVQ Communications, Inc., licensee of KTVQ(TV), Billings, Montana;
K09XK-D, Sheridan, Wyoming; K10GF-D, Miles City, Montana; K24GD-D, Hardin, Montana; K29HF/K45KO-D, Castle Rock, Montana; K69CM, Big Timber, Montana; K26GL, Columbus, Montana; K39HD-D, Red Lodge, Montana;

KVOA Communications, Inc., licensee of KVOA(TV), Tucson, Arizona,
K64BV/K04QP-D, Casas Adobes, Arizona; K20FO/K10QA-D, Sierra Vista, Arizona ; KRIS-TV, Corpus Christi, Texas; K20EK/K31KK-D, Kingsville-Alice, Texas; K30EG, Beeville-Refugio, Texas; K38EB/K48LL-D, Kingsville-Alice, Texas; K47DF/K22JA-D, Corpus Christi, Texas; K49DV, Beeville-Refugio, Texas; K68DJ, Corpus Christi, Texas;

Sangre de Cristo Communications, Inc., licensee of KOAA-TV, Pueblo, Colorado; K30JM-D, Colorado Springs, Colorado; and K19DY, Canon City, Colorado ;

WLEX Communications, LLC, licensee of WLEX(TV), Lexington, Kentucky ;

KSBY Communications, Inc., licensee of KSBY(TV), San Luis Obispo, California; and K10PV-D, Santa Barbara, California.