

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
Amendment of Parts 73 and 74 of the) **MB Docket No. 03-185**
Commission's Rules to Establish Rules for Digital)
Low Power Television, Television Translator, and)
Television Booster Stations and to Amend Rules)
For Digital Class A Television Stations)

To: The Commission (Electronically Filed)

REPLY COMMENTS OF SYNCOM MEDIA GROUP, INC.

1. Syncom Media Group, Inc. ("Syncom") hereby submits these Reply Comments, directed to the Comments of National Public Radio, Inc. ("NPR"). NPR's Comments improperly attempted to extend the scope of this proceeding far beyond the original intent and make unfounded accusations against Syncom by name.¹

2. This proceeding deals with a proposed digital television transition timetable for Class A, Low Power Television ("LPTV"), and TV Translator stations. The attempt by NPR to introduce an issue regarding the program content of analog LPTV stations operating on Channel 6 has nothing to do with the digital transition and should not be considered at all in this proceeding.

3. Nor is it appropriate for NPR, which is supported in part by taxpayer dollars, including taxes paid by LPTV operators, to call entities that are providing valuable services to the public "rogue" operations. Syncom's KXPD-LP, named by NPR in its Comments, is in

¹ Syncom did not file initial comments but is participating at the Reply Comment stage because of the unwarranted accusations against it made by NPR.

fact providing a highly popular broadcast service, which supports 43 jobs. Syncom is not violating any Commission rule in doing so.

4. If noncommercial FM radio stations have a problem with interference from Channel 6 LPTV stations, there are adequate enforcement mechanisms in place to deal with them, separate and apart from the instant proceeding.² If there is a need for a change in the Rules (which Syncom does not concede), that matter should be addressed separately. Meanwhile, Syncom has engaged highly expert professional engineering assistance and has made every effort to ensure that KXDP-LP's transmissions comply with all applicable requirements, including limits on spurious emissions. No one has demonstrated any non-compliance by KXDP-LP.³

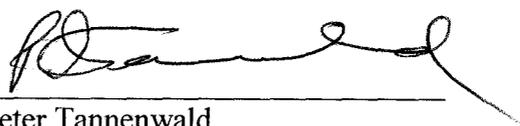
5. Syncom urges the Commission to disregard NPR's Comments, as NPR operates no TV stations of any kind and thus has no stake in the LPTV digital transition apart from its attempt to introduce new subject matter outside the scope of the proceeding. The Commission should establish digital transition rules for LPTV stations based on a financially and logistically realistic timetable, as discussed by many initial commenters. It should also

² Syncom has received only two complaints from the Commission's Denver Field Office to reception of KVOD(FM), 88.1 MHz, Lakewood, CO, which is hardly an overwhelming number. Syncom investigated and responded promptly to both, finding no interference in either case, based on testing with a consumer-grade "boom-box" receiver. NPR cites only one complaint, at fn. 13 of its Comments, with no details as to the location or full name of the complainant. It is not possible from the URL given by NPR to determine in what proceeding that one e-mail was submitted.

³ NPR's attempt to impose its own interpretation on Section 73.653 of the Rules, and one that is not self-evident, is especially far beyond the scope of this proceeding.

take into account the impact on unserved or underserved audiences of any premature termination of analog operation, at least on low-band VHF, if not all, channels.⁴

Respectfully submitted,



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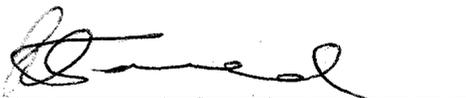
January 18, 2011

Counsel for Syncom Media Group, Inc.

CERTIFICATE OF SERVICE

I, Peter Tannenwald, do hereby certify that I have, this 18th day of January 2011, caused a copy of the foregoing "Reply Comments of Syncom Media Group, Inc." to be sent by first class United States mail, postage prepaid, to the following:

Gregory A. Lewis, Esq.
Associate General Counsel
National Public Radio, Inc.
635 Massachusetts Ave., N.W.
Washington, DC 20001



Peter Tannenwald

⁴ Syncom understands that a technology is being developed that will enable TV stations to provide digital television service while still allowing analog FM tuners to receive the aural part of their programming, perhaps as an ancillary service. The Commission should encourage that development and should allow time for it to come to fruition before completely terminating Channel 6 analog LPTV service.