

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

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

**SUPPLEMENTAL REPLY COMMENTS OF  
VENTURE TECHNOLOGIES GROUP, LLC**

Venture Technologies Group, LLC (VTG) submits these supplemental comments in response to the Commission’s Further Notice of Proposed Rulemaking in the above-captioned proceeding.<sup>1</sup> In the event that the Commission does not formally recognize these Supplemental Comments because they are submitted after the deadline, VTG respectfully requests the Commission to accept these as Informal Comments.

**Analog Shut-Off Date**

In the Fourth Report and Order In the Matter of Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service, MM Docket No. 87-268, Adopted: December 24, 1996, Released: December 27, 1996, at paragraph 45, the Commission stated:

*“we note that the Commission has previously determined that it would not mandate LPTV service conversion to DTV by a date certain.”*

VTG feels the FCC should stick to this position and not mandate conversion of LPTV stations from analog to digital but instead let market forces dictate the conversion.

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<sup>1</sup> *Amendment of Parts 73 and 74 of the 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*, Further Notice of Proposed Rulemaking and Memorandum Opinion and Order, FCC 10-172, MB Docket No. 03-185, released September 17, 2010 (Digital LPTV FNPRM).

VENTURE TECHNOLOGIES GROUP LLC

A handwritten signature in black ink, appearing to read 'L. Rogow', with a small dot above the 'i'.

Lawrence Rogow  
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Dated: March 25, 2011