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April 4, 2011

Ms. Marlene S. Dortch
 Secretary
 Federal Communications Commission
 445 12th Street S.W.
 Room 2-B450
 Washington DC 20554

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Re: **Mohave County TV Translator System: TVBD Protection
ET Docket Nos. 04-186, 02-380**

Dear Ms. Dortch:

As the Commission's records reflect, Mohave County Board of Supervisors is the licensee of numerous TV translator and TV translator relay stations used to deliver free, off-the-air television service to the citizens of the County. The County writes at this time in response to the Second Memorandum Opinion and Order, FCC 10-174, 25 FCC Rcd 18661 (2010). In particular, the County responds to the Order's provisions for protection of TV translator reception as against interference that could be caused by TV white space devices. *Id.* at paras. 42-45; Rule 15.712. Details follow.

Background

Mohave County occupies an area of over 13,300 square miles in northwestern Arizona. It stretches from Parker in the south to Colorado City on the Utah border in the north, a distance of nearly 200 miles. It includes a major portion of the Grand Canyon. It is one of the fastest growing Counties in the United States, its population having increased from 155,032 according to the 2000 census to 192,988 according to the 2009 estimates. It is also one of the most sparsely populated areas in the country with only 15 persons per square mile. The terrain is high desert surrounded by mountains. The County seat is Kingman, the population of which was approximately 26,903 based on the 2009 census estimates.

Given the remoteness of many of the communities and Indian reservations in the County, and the lack of regular television service (there is only one station operating in the County, KMOH-TV in Kingman), the Board of Supervisors determined many years ago to provide a

means for residents to receive over-the-air television. This was deemed especially important since many residents are on fixed incomes (e.g. retirees), and not able to afford cable television or satellite TV. The system evolved to include 35 TV translators re-broadcasting distant full-service television stations to communities like Chloride, Peach Springs, and Oatman.

TV translator relay and microwave stations are used to deliver distant Phoenix television signals to the County. Several of these stations are located on Smith Peak, about 75 miles from Phoenix. These stations pick up Phoenix signals and transmit them to another mountain-top site near Kingman, about 180 miles from Phoenix. From this point the signals are further relayed to the translators.

County residents depend upon this system for national and State-wide news, information, and entertainment which they have been receiving for years from the State capital.

The input channel of TV translators located within the protected contour of the primary station being re-broadcast, or within 80 km of that contour, are protected if registered in the Commission's database. See Order at para. 38. Rule 15.712 (c) also provides in the case of Broadcast Auxiliary Stations, such as TV translator relays, that protection is provided within 80 km of the location of the receive site without regard to proximity to a protected contour. With respect to translators receiving their input signal from another translator, it is understood that the protected contour rule applies, i.e. the input channels of stations located within 80 km of the protected contour of the station from which the signal is derived – in this instance, another translator – are protected.

Discussion

The County's consulting engineer, Robert DuTreil, Jr., has analyzed its translator system in light of the above standards. Mr. DuTreil has determined that none of the translators is beyond 80 km from the station being re-broadcast, either a distant full-service station, a TV translator relay station, or another translator.

There is one other situation which should be addressed. The County is licensed for several private microwave stations, one of which, WNTJ911, is used to feed translators in the vicinity of Black Rock. Microwave stations like this are not expressly covered by the terms of the Order or Rule 15.712. Under the circumstances presented, however, a waiver is requested pursuant to Rule 1.3. Such is clearly warranted so that the input channel for this translator, as well as the inputs of the stations it feeds, are protected, WNTJ911 being the sole source of free, over-the-air television available to many retired and fixed income residents in that area.

Attached hereto is a Technical Statement by Mr. DuTreil, an Exhibit listing the affected County stations and their respective input channels, and a diagram showing the overall layout of the County's translator system. In this regard, it should be noted that the Commission's database reflects in numerous cases an input channel which corresponds to the output of the primary, originating station ultimately re-broadcast, rather than the actual input after relays. Accordingly,

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the last Exhibit specifies which of the County's translators is showing incorrect data. It is requested that this information be included in the Commission's records.

Thank you.

Sincerely,



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Counsel for Mohave County

cc: A. Stillwell
R. Weller
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S. Buenzow
M. Bucher

TECHNICAL STATEMENT
REGARDING PROTECTION OF MOHAVE COUNTY
TRANSLATOR SYSTEM RECEIVE SITES

This Technical Statement was prepared on behalf of the Mohave County Board of Supervisors, licensee and permittee of numerous television translator stations and microwave relay stations in Mohave County, Arizona. The Mohave County system is employed to re-transmit various television stations originating from the Phoenix market. Microwave stations are employed within the system of TV translators to distribute the programming received from the Phoenix market.

The attached Figure 1 is a map that provides an overview of the Mohave County translator system. The primary receive point of the Phoenix TV stations is Smith Peak, which is located to the south of Mohave County, as indicated in Figure 1. The microwave stations WQHE248, WQHE249 and WQHE250 retransmit the signals received off the air from nine of the Phoenix stations, with each microwave station carrying three of the stations. As indicated in Figure 1, the stations received at Smith Peak are sent via microwave to Hayden Peak, where they are re-broadcast on various translators and intermediate microwave relays.

The microwave stations WQHE248, WQHE249 and WQHE250 are licensed as TV Translator Relay stations in the Broadcast Auxiliary Service (BAS). The input channels for these stations are protected pursuant to Section 15.712(c) of the FCC Rules. Figure 2 is a list of the input channels that are received by all of the Mohave County systems, including the microwave relays as Smith Peak, that should be in the FCC's database of protected receive sites.

There is a microwave relay station that is licensed in the private microwave service, WNTJ911, that receives the signal of K48AY off the air and sends it via microwave to a receive location at Black Rock in north Mohave County, where it is further distributed to translator stations in that area. Because WNTJ911 is not licensed in the BAS, it is not explicitly covered for protection under Section 15.712(c) of the FCC Rules. The licensee of WNTJ911 requests a waiver of the Rules to permit protection of the WNTJ911 receive site as if it were operating in the BAS service, since its function is essentially identical to a TV Translator Relay station such as those operated on Smith Peak.

The TV translator stations listed in Figure 2 all fall within the 80-km limit for receive site protection under Section 15.712(b) of the FCC Rules. However, a review of the FCC records for the Mohave County stations indicates that not all of the stations' input channels have been properly updated with the channel changes due to the digital transition. Therefore, Figure 2 is provided as a master list of the Mohave County stations' receive location channel protection requirements. It is requested that the FCC incorporate this list into the database of protected receive sites for the Mohave County stations.

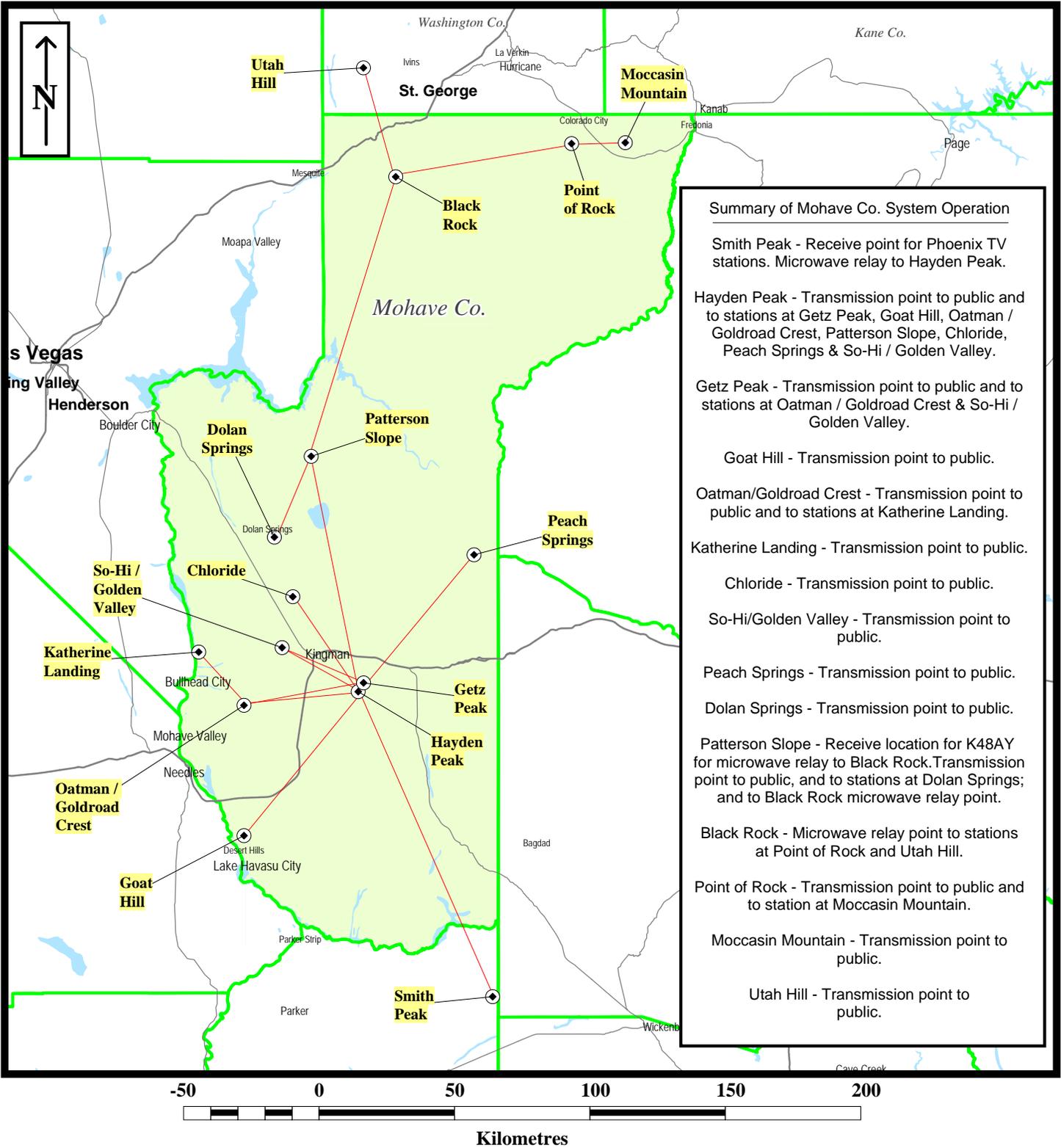


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April 1, 2011



OVERVIEW OF MOHAVE COUNTY TRANSLATOR SERVICE SYSTEM

MOHAVE COUNTY TRANSLATOR AND MICROWAVE
STATIONS INPUT CHANNELS TO BE PROTECTED

Call Sign	Site Name	N. Latitude (NAD 27)	W. Longitude (NAD 27)	Input Station	Input Channel to be Protected
K27DA	Getz Peak	35-06-37	113-52-55	K44DK	44
K31BI	Getz Peak	35-06-37	113-52-55	KLAS	7
K21EA	Goat Hill	34-36-09	114-22-13	K34EF	34
K29FD	Goat Hill	34-36-09	114-22-16	K23FV	23
K31GZ	Goat Hill	34-36-09	114-22-13	K49GE	49
K38IR	Goat Hill	34-36-09	114-22-16	K48AY	48
K39FV	Goat Hill	34-36-09	114-22-16	K44DK	44
K43GJ	Goat Hill	34-36-09	114-22-15	K41FT	41
K46GI	Goat Hill	34-36-09	114-22-13	K50CY	50
K16EV	Oatman / Goldroad Crest	35-02-09	114-22-14	K23FV	23
K17BN	Oatman / Goldroad Crest	35-02-09	114-22-14	K48AY	48
K21FU	Oatman / Goldroad Crest	35-02-09	114-22-14	K41FT	41
K31HY	Oatman / Goldroad Crest	35-02-09	114-22-14	K27DA	27
K42EU	Oatman / Goldroad Crest	35-02-09	114-22-14	K49GE	49
K02HR	Katherine Landing	35-12-46	114-33-18	K42EU	42
K04GT	Katherine Landing	35-12-46	114-33-18	K31HY	31
K07YJ	Katherine Landing	35-12-46	114-33-18	K17BN	17
K09KG	Katherine Landing	35-12-46	114-33-18	K30BQ	30
K11LX	Katherine Landing	35-12-46	114-33-18	K21FU	21
K12OF	Katherine Landing	35-12-46	114-33-18	K16EV	16
K23DK	Patterson Slope	35-51-48	114-05-45	K50CY	50
K36FZ	Patterson Slope	35-51-48	114-05-45	K49GE	49
K47HE	Patterson Slope	35-51-48	114-05-45	K41FT	41
K35EI	Dolan Springs	35-35-42	114-14-46	K23DK	23
K41BZ	Dolan Springs	35-35-42	114-14-46	K38GR	38
K43GU	Dolan Springs	35-35-42	114-14-46	K47HE	47
K30GG	Chloride	35-23-49	114-10-16	K41FT	41
K32DW	Chloride	35-23-49	114-10-16	KLVX	11
K42CQ	Chloride	35-23-49	114-10-16	K50CY	50
K49EU	Chloride	35-23-49	114-10-16	K48AY	48
K26GF	Peach Springs	35-32-10	113-25-52	K50CY	50
K42CP	Peach Springs	35-32-10	113-25-52	K48AY	48
K21EG	So-Hi/Golden Valley	35-13-40	114-12-54	K50CY	50
K46CG	So-Hi/Golden Valley	35-13-40	114-12-54	K27DA	27
K35EE	Moccasin Mountain	36-54-22	112-48-48	K27EJ	27
WQHE250	Smith Peak	34-04-02	113-21-18	KAZT-CD	36
WQHE250	Smith Peak	34-04-02	113-21-18	KUTP	26
WQHE250	Smith Peak	34-04-02	113-21-18	KASW	49
WQHE248	Smith Peak	34-04-02	113-21-18	KSAZ	10
WQHE248	Smith Peak	34-04-02	113-21-18	KPNX	12
WQHE248	Smith Peak	34-04-02	113-21-18	KNXV	15
WQHE249	Smith Peak	34-04-02	113-21-18	KTVK	24
WQHE249	Smith Peak	34-04-02	113-21-18	KPHO	17
WQHE249	Smith Peak	34-04-02	113-21-18	KAET	8
WNTJ911	Patterson Slope	35-51-48	114-05-49	K48AY	48