

My name is William Doerner. I own 2 translators in the Corpus Christi area. K277BL Corpus Christi and K241AT Flour Bluff. Both of these stations have now been retransmitting KSIX Corpus Christi. I also have 4 other translator applications in the far reaches of the Corpus Christi market. In the Corpus Christi market, we have a designation of "Process all Apps". While we can live with that determination, I would like to review facts as I see them.

In 2003, the FCC posted an opportunity to apply for a translator license.

There was a presumption by the prospective applicants, that if we they were willing to outbid all comers, and had a technically acceptable application, they could have that license.

If they were careful, they could technically be assured of a license, if they were willing to be the high bidder.

Investments were made based on this premise. Some of us spent a good deal of money.

Now, eight years after paying our engineering money, many of us get zero chance to get any return. How do we either recover our money or specifically decide to abandon the quest? Many now get neither as a choice.

Dismissing translator applications in a market, where it does not create any additional LPFM opportunities seems unjust. I would suggest....

- 1) An existing translator application should NOT be dismissed if it is grantable based on the Grid system. (Obvious)
- 2) A translator application should not be dismissed if it's dismissal, along with others, does not create an Additional LPFM opportunity, regardless of market.
- 3) Existing translator applications should be allowed the flexibility to rearrange themselves, subject to retaining a sufficient number of currently available LPFM allotments
- 4) There is a situation here of MANY applicants being punished for the actions of 2 applicants. "I" didn't file for over a thousand stations. I applied for "10". I had one dismissed. I sold one. I operate two. Perhaps the commission should decide on a loose cap which would eliminate the "Loose Abuse" of those two applicants.
- 5) Perhaps these two offending applicants should be sanctioned based on the number of permits they have sold.

Again I must restate the abject unfairness of asking for applications, accepting applications and then CHANGING YOUR MIND about applications after people have deployed resources to have those applications prepared.. You're killing us out here.

I would propose the FCC should, immediately, start a settlement window for existing Translator apps. Those applicants should be allowed maximum flexibility to

reallocate themselves including allowing unlimited frequency shifting, provided it does not preclude LPFM.

I would ask The Commission to NOT blanket dismiss any application which would not create an LPFM availability.

I would suggest the Commission find a way to compensate those who have applied who get subsequently dismissed based on a policy change.

Some of us are small businesses. VERY, small businesses. Many families, as did mine, decided to pay a lot of money to engineers and file Translator applications based on a good faith announcement from the Commission. Now, Eight years later, you decide to just say NEVER MIND! That is just fundamentally wrong. If If the Commission had move auction 83 to auction in a timely fashion this would all be in the past. Many of the LPFM station we desire to create would be on the air because Auction 83 would be over. The upcoming LPFM lp100 window would be over and those stations would be on the air.

Thank You

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