

As an LPTV operator I have relied on Commission orders and policies regarding LPTV. One of the enforcement tools to ensure compliance is the very fact of a reasonable expectation of renewal of License if the station is in compliance. The repacking presented so far does not ensure the future of my license even when in compliance. The discussion thus far has modification, doubling up with another broadcaster, moving as a focus - not reasonable expectations of any broadcaster.

I have spent considerable money, time, and energy to maintain the license. Now the parameters seem to be changing. The effort was with the knowledge I was to be secondary to primary TV stations, not every other service that could "possibly" be created. LPTV must work in strict parameters, must be financially feasible and now must base a small business plan on a moving, uncertain future. I have had to move inside an ever shrinking tier of spectrum. I have moved more than once and every move has been costly. Is there absolutely no concern by the Commission or Congress of such moves for small business? My hope continues to be that there is concern and the appeals will be heard. It seems Congressman Barton from the great state of Texas is concerned and I am pleased.

As one example of such uncertain future would be existing construction permits. Some are set to expire before the repacking. To build or not should be a business decision based on something other than unknown repacking. Please extend all construction permits beyond date certain to when auction/repacking is finished - a date uncertain at this point in time.

Is there no way to know for sure that other spectrum might be available? Has all the spectrum taken from broadcast television in past been utilized to the fullest? I read every day where it is still being speculated, bought and sold - not normally words used as synonyms for utilization.

Please obviously protect LPTV, not just in vague, veiled terms.

Thank you for allowing me to post my thoughts and comments.