Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC

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

STATEMENT IN SUPPORT OF NTA'S COMMENTS TO ESTABLISH A NEW DIGITAL TV TRANSLATOR SERVICE

COOPERATIVE TELEVISION ASSOCIATION ("CTV"), by its attorneys, hereby files its Statement supporting the Comments of the National Translator Association ("NTA") urging the adoption of new rules to permit digital operation of TV translators. In support thereof, the following is shown:

1. CTV is a non-profit television cooperative organized in October, 1992 under the laws of the State of Minnesota. It was formed by the following four Minnesota non-profit electric cooperatives, which are otherwise unrelated, to provide free, off the air TV and other programming services to about 30,000 households in the rural communities of St. James, Frost and Jackson, Minnesota, all of which are located in south west and south central Minnesota:

(a) Federated Rural Electric Association ("Federated Rural");

(b) South Central Electric Association ("South Central");

(c) Blue Earth-Nicollet-Faribault Cooperative Electric Association ("Blue Earth"); and

(d) Brown County Rural Electrical Association ("Brown County").

2. CTV is entirely owned and operated by the respective cooperatives for the sole purpose of providing 30 channels of TV translator service to the respective communities serviced by the rural electric cooperatives. In fact, the service area of CTV's TV translators is virtually the same as the electric cooperatives. Attached hereto as Appendix A is a list of each of the licenses owned by CTV, Federated Rural, South Central, and Blue Earth. Brown County has no broadcast interests. Importantly, CTV is vitally concerned that TV translators in rural America continue to flourish in a conducive regulatory environment, and that such stations continue to provide free over the air programming to such areas in a digital mode. It is for this reason that CTV supports NTA's comments herein.

3. More specifically, on August 29, 2003 the Commission issued a Notice of Proposed Rule Making ("Notice") seeking to bring digital TV service to rural America, thus taking an important step to further the progress toward the transition to a nationwide DTV service. In its Notice, the Commission has tentatively concluded that digital TV translator stations should be technically capable of retransmitting the complete signals of DTV broadcast stations for reception by the general public. Importantly, the Commission is mindful of the challenges presented by limited spectrum availability and the limited budgets of many rural TV translators such as those owned by CTV.

4. Recognizing the FCC's valid concerns, NTA has urged the FCC to hasten the authorization of digital capability for TV translators, while not upsetting the current relationship between existing TV translators and LPTV stations. In this connection, NTA believes that the rapid inauguration of a new digital TV translator service will help ensure the continued delivery of free broadcast services to rural America and other underserved areas in this country which are areas served by CTV. In other words, there is no justifiable public interest reason to deprive citizens of rural America

tors, when the rest of the country in more populous areas are able, and will be able, to obtain such service at the end of the digital TV transition.

5. In sum, we believe that NTA has presented cogent and compelling reasons for prompt adoption of rules and regulations by the FCC to expedite over-the-air digital TV translator reception in America's hinterlands and rural areas. Accordingly, NTA's Comments ought to be promptly adopted by the FCC.

Respectfully submitted,
COOPERATIVE TELEVISION ASSOC.
FEDERATED RURAL ELECTRIC ASSOC.
SOUTH CENTRAL ELECTRIC ASSOC.
BLUE EARTH-NICOLLET-FARIBAULT COOPERATIVE ELECTRIC ASSOC.

By: Howard J. Braun, Esq.
Its Attorneys

KATTEN MUCHIN ZAVIS ROSENMAN
1025 Thomas Jefferson Street, N.W.
East Lobby, Suite 700
Washington, DC 20007-5201
Tel: 202-625-3684; Fax: 202-295-1113
e-mail: howard.braun@kmzr.com

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EXHIBIT A

Cooperative Television Association of Southern Minnesota

Cooperative Television Association of Southern Minnesota

K14KE, St. James, MN
K16CG, St. James, MN
K21DG, St. James, MN
K23FY, Frost, MN
K24CP, St. James, MN
K26CS, St. James, MN
K35DC, St. James, MN
K40BU, St. James, MN
K42AV, St. James, MN
K44AD, St. James, MN
K46AA, St. James, MN
K48AA, St. James, MN
K50AB, St. James, MN
K52AB, St. James, MN
K54AC, St. James, MN

Blue Earth-Nicollet-Fariault Cooperative Electric Association

K58FC, Frost, MN
K59FN, Jackson, MN
K60FY, Frost, MN
K61GE, Jackson, MN
K62FH, Frost, MN

Federated Rural Electric Association

K45EH, Jackson, MN
K47EL, Jackson, MN
K51EN,Jackson, MN
K53EV, Jackson, MN
K57GE, Jackson, MN

South Central Electric Association

K14KD, Frost, MN
K27FI, Frost, MN
K31EF, Frost, MN
K36FI, Frost, MN
K65FW, Frost, MN