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

WILLMAR ASSEMBLY OF GOD CHURCH ("WAGC"), licensee of TV translator station K27CK, Willmar, Minnesota, 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. WAGC is a non-profit corporation organized under the laws of Minnesota and is affiliated with the General Council of the Assemblies of God denomination. It has been in existence since 1934. Station K27Ck was acquired by WAGC in 1985 and, since then, has broadcast the programming of Trinity Broadcasting Network ("TBN"). From time to time, K27CK has also broadcast locally produced and originated programming of interest to the approximately 45,000 residents of its predominantly rural service area. Funding for the station's operations is received from voluntary contributions of WAGC's congregants and some payments from TBN.

2. Willmar's population is close to 18,000 persons and it is the county seat of Kandiyohi County, Minnesota. Located about 100 miles west of Minneapolis – St. Paul, Willmar is the fastest growing non-metropolitan city in Minnesota. Surrounded by lakes, rolling hills, and

rich farmland, Willmar combines the friendly neighborliness of a small town with the opportunities of a large metropolitan area.

3. As a TV translator serving rural America, WAGC is thus 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. Accordingly, WAGC supports NTA's comments herein.

4. 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 WAGC.

5. 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. Moreover, 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 WAGC. In other words, there is no justifiable public interest reason to deprive citizens of rural America the benefits of free digital TV reception via TV translators, 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.

6. 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,
WILLMAR ASSEMBLY OF GOD CHURCH
(K27CK, WILLMAR, MINNESOTA)

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