

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

RENVILLE COUNTY TV CORPORATION (“Renville”), 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. Renville is the licensee of the following seven TV translator stations, all licensed to Olivia, Minnesota, the county seat of Renville County, Minnesota:

- K23FP
- K45FR
- K49AJ
- K51AL
- K53AO
- K55CK
- K57AE

These stations provide a full range of free network, independent and educational programming to the residents of Olivia and surrounding Renville County.

2. Olivia’s population is about 3,000 persons and it is located 90 miles west of Minneapolis – St. Paul. It is the largest town in Renville County, which is the richest

agricultural county in Minnesota. In fact, Olivia and surrounding Renville County is known as America's "Corn Capital".

3. Situated in a small rural area, Renville thus is vitally concerned that TV translators continue to flourish in a conducive regulatory environment, and that such stations continue to provide free over-the-air programming to rural America in a digital mode. It is for this reason that Renville 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 Renville.

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. 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 Renville. 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 coun-

try 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,
RENVILLE COUNTY TV CORPORATION



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