

I would like to file a comment regarding the digital LPTV rule making proposal. I'm filing this response for KGCS-TV in Joplin, Mo., at Missouri Southern State University licensed to the Board of Governors, facility #4206. We are a "class A" eligible station. We are also a non-commercial station. The second item is of crucial interest to the continued operations of KGCS--"Whether TV channels 52-59 and 60-69 should be made available for digital LPTV when applicants can show that other channels are unavailable. This situation directly affects KGCS-TV, since we operate on channel 57. The FCC had previously determined that those channels would be auctioned off after digital conversion were made, leaving us without a channel. Recent searches done by consultants have shown that there were not any channels available at the present time to go to. Therefore, we feel that it is important to make comments supporting the continuation of those channels for digital LPTV. The fifth item is also one that should be addressed, "Whether statutory provisions for cessation of analog TV service applies to LPTV service, and if not, should the commission establish a trigger-based mechanism." The FCC established specific dates for full-power television stations to have a digital signal on the air. Due to the limited budgets facing low power stations such as ours, it would be in our best interest to seek some sort of mechanism other than a mandatory deadline.

On the "Commission's digital LPTV NPRM seeks comment on rules governing transmission" the first item addressed in this section, dealing with power limits would directly affect KGCS-TV, "The adequacy of power limits...channels 14-69 analog (peak ERP of 150kw and digital (average) ERP of 15kW. At the present time our ERP is 4.2kw. This barely covers our city of license. By being able to increase our power to 150kw ERP analog, we would be able to deliver our product; educational classes, governmental meetings (Joplin City council and Joplin R8 Board, our Board of Governors) our network "America One," St. Louis Cardinals baseball affiliate, to a larger audience than our present 4.2kw transmitter will allow.